

Notice of Decision and Reasons for Decision

Applicant:	'DW7'
Agency:	Commercial Passenger Vehicles Victoria
Decision date:	5 November 2021
Exemptions considered:	Sections 28(1)(d), 30(1), 33(1), 34(1)(b), 34(4)(a)(ii)
Citation:	'DW7' and Commercial Passenger Vehicles Victoria (Freedom of Information) [2021] VICmr 330 (5 November 2021)

FREEDOM OF INFORMATION – Multi Purpose Taxi Program (MPTP) expansion program – data collection – deed for proof of concept – fresh decision

All references to legislation in this document are to the *Freedom of Information Act 1982* (Vic) (**FOI Act**) unless otherwise stated.

Notice of Decision

I have conducted a review under section 49F of the Agency's fresh decision to refuse access to documents requested by the Applicant under the FOI Act.

My decision on the Applicant's request differs from the Agency's decision.

I am satisfied the exemptions in sections 28(1)(b), 28(1)(d) and 33(1) apply to some of the documents. However I am not satisfied sections 30(1), 34(1)(b) or 34(4)(a)(ii) apply to any of the documents.

As it is practicable to edit some of the documents to delete irrelevant and exempt information, I have determined to grant access to the documents in part.

The Schedule of Documents in **Annexure 1** sets out my decision in relation to each document.

My reasons for decision follow.

Sven Bluemmel
Information Commissioner

5 November 2021

Reasons for Decision

Background to review

1. The Applicant made a request to the Agency seeking access to the following documents:
 1. The design, planning and considerations for the trial with [business undertaking] to undertake MPTP work. Eg., how many MPTP trips were anticipated to be conducted during the trial, how the trial was to be communicated to potential participants and drivers.
 2. How and by whom MPTP users were informed of the trial and whether specific users were targeted eg., by medical condition or whether all users in the trial area were notified and invited to participate.
 3. Whether only a subset of [business undertaking] drivers were to be involved in the trial or whether any specific criteria was used in the booking of MPTP work eg., based on vehicle specifications, driver ratings, length of driver experience with [business undertaking].
 4. The rationale for continuing the MPTP trial with [business undertaking] while under stage 4 lockdown conditions when patronage was reduced by 90 per cent.
 5. The outcomes, results, conclusions and considerations following completion of said trial and whether any compensation was made to the findings in light of the atypical pandemic conditions under which the trial was conducted.
 6. a. The total number of trips conducted as part of the [business undertaking] MPTP trial.
 - b. A breakdown of the number of unique users taking part in the trial and the number of individual [business undertaking] drivers.
 - c. The number of bookings cancelled by the driver and/or passenger throughout the trial and the reason given for cancellation.
 - d. The number of trips conducted with passengers who travel with collapsible wheelchairs or other mobility devices.
 - e. The number of trips cancelled by the rider or driver due to the vehicle being unable to accommodate mobility devices.
 - f. The total cost to [business undertaking] for conducting the MPTP trial.
 7. The ongoing arrangement and/or agreement between [business undertaking] and [Commercial Passenger Vehicles Victoria] (CPVV) specifying the conditions under which [business undertaking] must operate to accept MPTP bookings. For example,
 - a. A document outlining any agreed or specific fare rates for MPTP work.
 - b. Any agreed vehicle specifications.
 - c. An agreement specifying who is liable for MPTP passengers in the event of an incident, the [business undertaking] driver or [business undertaking] entity.
 - d. An agreement to co-operate with authorities in the event of an incident or investigation.
 - d. The mechanism and process by which a driver will ensure that the MPTP card holder is traveling in the vehicle for an MPTP trip.
 - e. How trip cancellation and cleaning fees will be charged - to the passenger or the MPTP scheme?

- g. How complaints will be dealt with.
 - h. How and whether CPVV has agreed to support [business undertaking] to communicate with MPTP users about their service eg., by providing contact details of MPTP card holders to [business undertaking] or by communicating with card holders on behalf of [business undertaking].
8. Whether any fees or charges are payable to the CPVV by any [Booking Service Provider] (BSP) to participate in the MPTP scheme.
 9. Which considers or describes the possible broader impact (financial or otherwise) to the industry in expanding the MPTP scheme to services provided by [business undertaking] and how any negative consequences will be managed. Eg., impact to other disability services provided by CPVV's [Wheelchair Accessible Vehicle] (WAVs) and consequences for regional operators and other sectors of the industry.
 10. Informing other BSPs in the industry of the intention to expand the MPTP scheme to include [business undertaking] services and any feedback that was invited or provided from these stakeholders.
 11. Evidence that the Minister for Transport was informed of the decision to expand the MPTP scheme to include [business undertaking] services prior to the CPVV media announcement on [date].
2. The Applicant advised they did not seek personal affairs information other than the names of executive officers.
 3. The Agency identified 73 documents falling within the terms of the Applicant's request. It decided to grant access to some of those documents in part, and refuse access to other documents in full. The Agency relied on sections 28(1)(d), 30(1), 34(1)(b), 34(4)(a)(ii) to refuse access to parts of the document. The Agency's decision letter sets out the reasons for its decision.

Review application

4. The Applicant sought review by the Information Commissioner under section 49A(1) of the Agency's decision to refuse access.
5. Section 49M(1) permits an agency to make a fresh decision on an FOI request during a review. On 12 July 2021, the Agency made a fresh decision to release further information. This is within the required 28 days under section 49M(2).
6. The Applicant did not agree with the Agency's fresh decision and, as required by section 49MA(2), I proceeded with my review on the basis of the fresh decision.
7. I have examined copies of the documents subject to review.
8. The Applicant and the Agency were invited to make a written submission under section 49H(2) in relation to the review.
9. I have considered all communications and submissions received from the parties.
10. In undertaking my review, I have had regard to the object of the FOI Act, which is to create a general right of access to information in the possession of the Government or other public bodies, limited only by exceptions and exemptions necessary to protect essential public interests, privacy and business affairs.

11. I note Parliament's intention the FOI Act must be interpreted so as to further the object of the Act and any discretions conferred by the Act must be exercised, as far as possible, so as to facilitate and promote the disclosure of information in a timely manner and at the lowest reasonable cost.
12. In its submission the Agency provided the following information in relation to the documents subject to his review:

The Multi-Purpose Taxi Program (MPTP) supports people with accessibility and mobility needs, by paying half the cost of each commercial passenger vehicle trip taken by an MPTP member, up to a total of \$60.

In 2017, as part of the commercial passenger vehicle industry reforms, the Victorian Government made a commitment to expand the amount of [Data Collection Provider] DCPs that provide MPTP services to promote accessibility in transport options for vulnerable members of the community. Until this time, the provision of MPTP services were provided by taxis with one DCP.

The DCP expansion will provide MPTP members with greater choice and more equitable access to a more diverse range of service types and options enjoyed by other Victorians, including deregulated fares.

Enabling the DCP expansion requires Booking Service Providers (BSPs) to develop and trial new DCP systems. CPVV's website invites any BSP interested in becoming an MPTP provider to contact CPVV and points to the requirements set out in A guide to providing Multi-Purpose Taxi Program services. These include data and payment process, MPTP member experience, CPV driver experience and fraud management processes.

At this point in time, the DCP expansion program is still underway as CPVV continues to work with other interested parties to develop more DCP solutions suitable for the market.

Complaint regarding adequacy of search

13. Alongside their review application, the Applicant raised concerns regarding the adequacy of the Agency's document searches. In particular, the Applicant raised concerns that documents were not returned in response to points 3, 8 and 9 of their request.
14. In accordance with section 61B(3), OVIC determined to address these concerns as part of this review.
15. OVIC made inquiries with the Agency in relation to the Applicant's concern. The Agency's response was provided to the Applicant for their consideration.
16. In the circumstances, I am satisfied OVIC has made reasonable inquiries with the Agency regarding the Applicant's concerns and the Agency conducted a thorough and diligent search for relevant documents based on the terms of the Applicant's request.

Review of exemptions

Section 28(1) – Cabinet documents

17. Section 28(7)(a) defines 'Cabinet' as including a committee or sub-committee of Cabinet.
18. In *Ryan v Department of Infrastructure*,¹ the Victorian Civil and Administrative Tribunal (**VCAT**) observed:

It has been said that a document is not exempt merely because it has some connection with Cabinet, or is perceived by departmental officers or others as being of a character that they believe ought to be regarded as a Cabinet document or because it has some Cabinet "aroma" around it. Rather, for a document to come

¹ (2004) VCAT 2346 at [33].

within the Cabinet document exemption, “it must fit squarely within one of the four exemptions [(now five)]” in section 28(1) of the Act.

19. Where a document attracts the Cabinet exemption, the exemption in section 28(1) provides complete protection from release of the document.

Section 28(1)(b)

20. Section 28(1)(b) provides that a document is exempt if it has been prepared by a Minister or on his or her behalf or by an agency for the purpose of submission for consideration by the Cabinet.
21. A document will only be exempt under section 28(1)(b) if the sole purpose, or one of the substantial purposes, for which it was prepared, was for submission to Cabinet for its consideration. In the absence of direct evidence, the sole or substantial purpose of a document may be determined by examining the use of the document, including whether it was submitted to Cabinet.²

Section 28(1)(d)

22. Section 28(1)(d) provides a document is an exempt document if it is a document the disclosure of which would involve the disclosure of any deliberation or decision of the Cabinet, other than a document by which a decision of the Cabinet was officially published.
23. A document will be exempt under section 28(1)(d) if there is evidence that Cabinet discussed various options contained in the document and chose between those options.³
24. A ‘decision’ means any conclusion as to the course of action the Cabinet adopts whether that are conclusions as to final strategy on a matter or conclusions about how a matter should proceed.⁴
25. Where a decision or the recommendation of Cabinet has been made public, releasing information would not disclose the Cabinet decision or deliberation.⁵
26. My decision regarding section 28(1)(b) and (d) is set out in the Schedule of Documents at **Annexure 1**.

Section 30(1)

27. Section 30(1) has three requirements:
 - (a) the document must disclose matter in the nature of opinion, advice or recommendation prepared by an officer or Minister, or consultation or deliberation that has taken place between officers, Ministers or an officer and a Minister; and
 - (b) such matter must be made in the course of, or for the purpose of, the deliberative processes involved in the functions of an agency or Minister or of the government; and
 - (c) disclosure of the matter would be contrary to the public interest.
28. The exemption does not apply to purely factual material in a document.⁶

² *Secretary to the Department of Treasury and Finance v Della Riva* [2007] VSCA 11 at [15].

³ *Smith v Department of Sustainability and Environment* (2006) 25 VAR 65; [2006] VCAT 1228 at [23].

⁴ *Della-Riva v Department of Treasury and Finance* (2005) 23 VAR 396; [2005] VCAT 2083 at [30].

⁵ *Honeywood v Department of Innovation, Industry and Regional Development* (2004) 21 VAR 1453; [2004] VCAT 1657 at [26].

⁶ Section 30(3).

29. I must also be satisfied releasing this information is not contrary to the public interest. This requires a 'process of the weighing against each other conflicting merits and demerits'.⁷
30. In deciding if release is contrary to the public interest, I must consider all relevant facts and circumstances remaining mindful that the object of the FOI Act is to facilitate and promote the disclosure of information.
31. In deciding whether the information exempted by the Agency would be contrary to the public interest, I have given weight to the following relevant factors:⁸
- (a) the right of every person to gain access to documents under the FOI Act;
 - (b) the degree of sensitivity of the issues discussed in the documents and the broader context giving rise to the creation of the documents;
 - (c) the stage or a decision or status of policy development or a process being undertaken at the time the communications were made;
 - (d) whether disclosure of the documents would be likely to inhibit communications between agency officers, essential for the agency to make an informed and well-considered decision or participate fully and properly in a process in accordance with the agency's functions and other statutory obligations;
 - (e) whether disclosure of the documents would give merely a part explanation, rather than a complete explanation for the taking of a particular decision or the outcome of a process, which the agency would not otherwise be able to explain upon disclosure of the documents;
 - (f) the impact of disclosing documents in draft form, including disclosure not clearly or accurately representing a final position or decision reached by the agency at the conclusion of a decision or process; and
 - (g) the public interest in the community being better informed about the way in which the agency carries out its functions, including its deliberative, consultative and decision-making processes and whether the underlying issues require greater public scrutiny.
32. My decision regarding section 30(1) is set out in the Schedule of Documents at **Annexure 1**.

Section 33(1) – Documents affecting personal privacy

33. A document is exempt under section 33(1) if two conditions are satisfied:
- (a) disclosure of the document under the FOI Act would 'involve' the disclosure of information relating to the 'personal affairs' of a person other than the Applicant;⁹ and
 - (b) such disclosure would be 'unreasonable'.
34. Information relating to a person's 'personal affairs' includes information that identifies any person, or discloses their address or location. It also includes any information from which this may be reasonably determined.¹⁰

⁷ *Sinclair v Maryborough Mining Warden* [1975] HCA 17; (1975) 132 CLR 473 at [485], adopted in *Department of Premier and Cabinet v Hulls* [1999] VSCA 117 at [30].

⁸ *Hulls v Victorian Casino and Gambling Authority* (1998) 12 VAR 483.

⁹ Sections 33(1) and (2).

¹⁰ Section 33(9).

35. The concept of ‘unreasonable disclosure’ involves balancing the public interest in the disclosure of official information with the personal interest in privacy in the particular circumstances of a matter.
36. Section 33(2A) requires that, in deciding whether the disclosure of a document would involve the unreasonable disclosure of information relating to the personal affairs of any person, I must take into account whether the disclosure of the information would, or would be reasonably likely to, endanger the life or physical safety of any person. However, I do not consider this to be a relevant factor in the circumstances.
37. The Agency advised it has consulted with the third party concerned. I have taken their views into consideration below.
38. My decision regarding section 34(1)(b) is set out in the Schedule of Documents at **Annexure 1**.

Section 34– Documents relating to trade secrets etc

Section 34(1)(b)

39. Section 34(1)(b) provides a document is an exempt document if its disclosure under the FOI Act would disclose information acquired by an agency (or a Minister) from a business, commercial or financial undertaking and:
 - (a) the information relates to other matters of a business, commercial or financial nature; and
 - (b) the disclosure of the information would be likely to expose the undertaking unreasonably to disadvantage.
40. In *Thwaites v Department of Human Services*,¹¹ VCAT observed the phrase ‘information acquired’ in section 34(1) signifies the need for some positive handing over of information in some precise form.
41. VCAT has also recognised the words ‘business, commercial or financial nature’ have their ordinary meaning.¹²
42. The Agency advised it consulted with two third party business undertakings.

Consultation with business undertaking 1

43. Business undertaking 1 responded to the Agency’s request for its views on disclosure of the documents under the FOI Act, advising the following in relation to certain documents:

Document 4

The Deed for Proof of Concept contains confidential business and commercial information of both [business undertaking] and CPVV. The confidential information relates to private [business undertaking] employee information (parties, notice details and execution block), the nature and operation of the MPTP [clause and schedule references), as well as the sensitive risk profiles of both [the business undertaking] and CPVV (clause references).

The disadvantage would be for a [competitor] to emulate our strategic approach to developing and implementing a provider-funded trial program, in anticipation of a publicly funded fully expanded program. The disadvantage is likely to occur given the heightened competition in the ridesharing industry and the

¹¹ (1999) 15 VAR 1.

¹² *Gibson v Latrobe CC* [2008] VCAT 1340 at [25].

keen interest in our trade secrets by the taxi industry and our rideshare competitors. The disadvantage is unreasonable because the disclosure would cause substantial harm to [the business undertaking's] competitive position, particularly as this information is not generally available to competitors.

Document 5

The [business undertaking] MPTP Response to CPVV contains detailed commercial information, the disclosure of which would likely expose [business undertaking] unreasonably to disadvantage. Specifically, the [the business undertaking] MPTP Response to CPVV includes detailed descriptions of underlying processes to provide service and customer sign-up flow (see for example pages [numbers]).

The disadvantage would be our competitors using the MPTP Launch Plan to emulate our custom-built registration process. The disadvantage is likely to occur given the heightened competition in the ridesharing industry and the keen interest in our trade secrets by the taxi industry and our rideshare competitors. The disadvantage is unreasonable because the disclosure would cause substantial harm to [the business undertaking's] competitive position, particularly as this information is not generally available to competitors.

Document 35

The MPTP Launch Plan contains detailed commercial information, the disclosure of which would likely expose [business undertaking] unreasonably to disadvantage. Specifically, the MPTP Launch Plan includes detailed trial performance information (see for example pages [numbers]) and scheme customer sign-up flow (see for example page [number]).

The disadvantage would be our competitors using the MPTP Launch Plan to emulate our custom-built registration process. The disadvantage is likely to occur given the heightened competition in the ridesharing industry and the keen interest in our trade secrets by the taxi industry and our rideshare competitors. The disadvantage is unreasonable because the disclosure would cause substantial harm to [the business undertaking's] competitive position, particularly as this information is not generally available to competitors.

Remainder of the documents

The [business undertaking] MPTP Trial Reports contain detailed commercial information, the disclosure of which would likely expose both [business undertaking] and CPVV unreasonably to disadvantage. Specifically, the [the business undertaking] MPTP Trial Reports contain detailed reporting on performance of trial, as well as internal methods for assessing viability of deployed programs. The disadvantage to [the business undertaking] would be our competitors using the [business undertaking] MPTP Trial Reports to gain knowledge of and emulate key internal business performance metrics. The document also contains commercial information about our process to resolve back-end system issues. The disadvantage is likely to occur given the heightened competition in the ridesharing industry and the keen interest in our trade secrets by the taxi industry and our rideshare competitors.

The disadvantage is unreasonable because the disclosure would cause substantial harm to [the business undertaking's] competitive position, particularly as this information is not generally available to competitors. The disadvantage to CPVV could be the consequences of breaching its confidentiality obligations under the Deed of Agreement for MPTP Data Services.

Consultation with business undertaking 2

44. The second business undertaking objects to the disclosure of a small amount of information in the documents it considers personal information. Having reviewed that information, I agree it is personal affairs information not sought by the Applicant and therefore irrelevant to the request.

Section 34(2) provides:

45. In deciding whether disclosure of information would expose an undertaking unreasonably to disadvantage, for the purposes of paragraph (b) of subsection (1), an agency or Minister may take account of any of the following considerations—
- (a) whether the information is generally available to competitors of the undertaking;
 - (b) whether the information would be exempt matter if it were generated by an agency or a Minister;
 - (c) whether the information could be disclosed without causing substantial harm to the competitive position of the undertaking; and
 - (d) whether there are any considerations in the public interest in favour of disclosure which outweigh considerations of competitive disadvantage to the undertaking, for instance, the public interest in evaluating aspects of government regulation of corporate practices or environmental controls—

and of any other consideration or considerations which in the opinion of the agency or Minister is or are relevant.

46. My decision regarding section 34(1)(b) is set out in the Schedule of Documents at **Annexure 1**.

Section 34(4)(a)(ii)

47. Section 34(4)(a)(ii) provides a document is an exempt document if it contains, ‘in the case of an agency engaged in trade or commerce, information of a business, commercial or financial nature that would if disclosed under this Act be likely to expose the agency unreasonably to disadvantage’.
48. VCAT has held ‘the terms ‘trade’ and ‘commerce’ are not words of art; rather they are expressions of fact and terms of common knowledge’.¹³ VCAT has adopted the view of the Federal Court of Australia that these terms are ‘of the widest import’.¹⁴
49. The provision contemplates that disclosure of a document under the FOI Act may expose the agency to a certain measure of disadvantage, and that any such exposure must be unreasonable.
50. In relation to section 34(4)(a)(ii), the Agency submits:

CPVV has applied exemption s34(4)(a)(ii) to documents where if they were to be released, it may deter future DCPs in negotiating openly with CPVV to provide MPTP services. This in turn will ultimately impact on the ability of the Victorian Government to deliver its commitment to the detriment of MPTP members. In particular, the negotiations between [the business undertaking] and CPVV clearly outline detailed conditions that may affect future negotiations with other providers. These documents also contain information relating to current ongoing negotiations between CPVV and other potential DCPs.

Furthermore, disclosure of these documents may potentially adversely impact the Victorian Government’s financial interests in negotiating large sums for the provision of MPTP services. As the DCP expansion program remains ongoing, CPVV is intending to negotiate with other potential providers to expand the provision of services by DCPs. Disclosure of the documents may therefore inhibit the Victorian Government’s ability to effectively negotiate with other providers.

Terms negotiated with one booking service provider may not be necessary or relevant to negotiations with another booking service provider based on size, technology, risk processes and more. Disclosing these terms may therefore give a competitor an unfair advantage.

¹³ *Pallas v Roads Corporation (Review and Regulation)* [2013] VCAT 1967 at [33].

¹⁴ *Ibid* at [34]; *Re Ku-Ring-Gai Co-operative Building Society (No 12)* Ltd (1978) 22 ALR 621 at [649].

Documents 45 – 58 contain trip data from the trial. CPVV collects trip data on a confidential basis under the *Commercial Passenger Vehicle Industry Act 2017* and is restricted from disclosing this information under section 254 of this Act. Trip data informs high-level government decision making and continued flow of confidential trip data is essential to CPVV's role as safety regulator.

BSPs are unlikely to participate in the DCP expansion program if it is likely their trip data will be disclosed to the public. This reasoning is based on CPVV's relationships with BSPs providing trip data to CPVV as a regulator. CPVV considers it is against the public interest to disclose this trip data as it may potentially deter other BSPs from participating in providing much needed transport services to vulnerable members of the community and providing the trip data associated with that participation.

51. My decision regarding section 34(4)(a)(ii) is set out in the Schedule of Documents at **Annexure 1**.

Section 35(1)(a) – Documents containing material obtained in confidence

52. A document is exempt under section 35(1)(a) if two conditions are satisfied:

- (a) disclosure would divulge information or matter communicated in confidence by or on behalf of a person or a government to an agency or a Minister; and
- (b) the information would be exempt matter if it were generated by an agency or Minister.

53. My decision regarding section 35(1)(a) is set out in the Schedule of Documents at **Annexure 1**.

Section 38 - Documents to which secrecy provisions of enactments apply

54. A document is an exempt document if there is in force an enactment applying specifically to information of a kind contained in the document and prohibiting persons referred to in the enactment from disclosing information of that kind, whether the prohibition is absolute or is subject to exceptions or qualifications.

55. For section 38 to apply to an enactment, the enactment must be formulated with such precision that it specifies the actual information sought to be withheld.

56. Noting the Agency's submission in relation to Documents 45 – 58 that it was restricted from disclosing trip data it collects on a confidential basis under the *Commercial Passenger Vehicle Industry Act 2017 (CPVI Act)*, for completeness I have considered whether section 254 of that Act may be a secrecy provision for the purposes of section 38.

57. Having viewed the relevant provisions of the CPVI Act, I am not satisfied the provisions are specific enough to be considered a secrecy provision for the purposes of section 38 of the FOI Act. I have therefore not further considered section 38 in this matter.

Section 25 – Deletion of exempt or irrelevant information

58. Section 25 requires an agency to grant access to an edited copy of a document where it is practicable for the agency or Minister to delete exempt or irrelevant information and the applicant agrees to receiving such a copy.

59. Determining what is 'practicable' requires consideration of the effort and editing involved in making the deletions 'from a resources point of view'¹⁵ and the effectiveness of the deletions. Where deletions

¹⁵ *Mickelborough v Victoria Police (General)* [2009] VCAT 2786 [31]; *The Herald and Weekly Times Pty Limited v The Office of the Premier (General)* [2012] VCAT 967 at [82].

would render the document meaningless they are not 'practicable' and release of the document is not required under section 25.¹⁶

60. I have considered the information the Agency deleted from the documents as irrelevant. I agree it falls outside the scope of the Applicant's request because it relates to personal affairs information not sought by the Applicant.
61. I have considered the effect of deleting irrelevant and exempt information from the documents. In my view, it is practicable for the Agency to delete the irrelevant and exempt information, because it would not require substantial time and effort, and the edited documents would retain meaning.

Conclusion

62. On the information available, I am satisfied the exemptions in sections 28(1)(b), 28(1)(d) and 33(1) apply to some of the documents. However I am not satisfied sections 30(1), 34(1)(b) or 34(4)(a)(ii) apply to any of the documents.
63. As it is practicable to edit some of the documents to delete irrelevant and exempt information, I have determined to grant access to the documents in part.

Review rights

64. If either party to this review is not satisfied with my decision, they are entitled to apply to VCAT for it to be reviewed.¹⁷
65. The Applicant may apply to VCAT for a review up to 60 days from the date they are given this Notice of Decision.¹⁸
66. The Agency may apply to VCAT for a review up to 14 days from the date it is given this Notice of Decision.¹⁹
67. Information about how to apply to VCAT is available online at www.vcat.vic.gov.au. Alternatively, VCAT may be contacted by email at admin@vcat.vic.gov.au or by telephone on 1300 018 228.
68. The Agency is required to notify the Information Commissioner in writing as soon as practicable if either party applies to VCAT for a review of my decision.²⁰

When this decision takes effect

69. I have decided to release documents that contain matters of a commercial nature relating to a third party business undertaking.
70. The relevant third party will be notified of my decision and is entitled to apply to VCAT for a review within 60 days from the date they are given notice.
71. My decision does not take effect until third party review period (stated above) expires. If a review application is made to VCAT, my decision will be subject to any VCAT determination.

¹⁶ *Honeywood v Department of Human Services* [2006] VCAT 2048 [26]; *RFJ v Victoria Police FOI Division (Review and Regulation)* [2013] VCAT 1267 at [140], [155].

¹⁷ The Applicant in section 50(1)(b) and the Agency in section 50(3D).

¹⁸ Section 52(5).

¹⁹ Section 52(9).

²⁰ Sections 50(3F) and (3FA).

Annexure 1 Schedule of Documents

Doc No	Date	Description	Number of Pages	Agency decision	OVIC decision	OVIC comments
FOI – 01. Design, planning and consideration for trial with [a business undertaking]						
1	[date]	Confidential Commission Paper on MPTP Expansion: Future Strategy	22	Released in part Sections 30(1), 34(1)(b), 34(4)(a)(ii)	Release in part section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 30(1): I agree the document contains matter in the nature of the opinion, advice and recommendation of an agency, provided for the purpose of the deliberative processes of the Agency – being the adoption of new service providers to a subsidy program. While I note it contemplates future actions required by each party, I do not consider disclosure would be contrary to the public interest. Rather, it demonstrates the way in which the Agency is meeting its regulatory functions. In my view disclosure of such information is in the public interest. The document is therefore not exempt under section 30(1). Section 34(1)(b): The document contains

Doc No	Date	Description	Number of Pages	Agency decision	OVIC decision	OVIC comments
						<p>information obtained from business undertakings. I have decided it would not expose those undertakings unreasonably to disadvantage as the document does not contain detail that would place those undertakings at a competitive disadvantage.</p> <p>Section 25: The information deleted by the Agency is personal affairs information not sought by the Applicant. This information is therefore irrelevant to the request. I consider it is practicable to delete this irrelevant information from the document.</p>
2	[date]	CPVV Communications Plan	10	Released in part Section 25	Release in part Section 25 The document is to be released with irrelevant	Section 25: See comments for Document 1.

Doc No	Date	Description	Number of Pages	Agency decision	OVIC decision	OVIC comments
					information deleted in accordance with section 25.	
3	[date]	Multi Purpose Tax Program Data Collection Provider Package Version 2.3	21	Released in part Section 25	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 25: See comments for Document 1.
4	[date]	Deed for Proof of Concept – executed	32	Released in part Sections 34(1)(b), 34(4)(a)(ii)	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 34(1)(b): It is not clear the document contains information obtained from a business undertaking. However, even if it were, I am not satisfied it contains any proprietary information of that undertaking. Rather it provides a detailed list of actions that undertaking is required to take to satisfy the Agency it can provide a particular service, and agrees to what I would consider are standard terms regarding liability, confidentiality and

Doc No	Date	Description	Number of Pages	Agency decision	OVIC decision	OVIC comments
						<p>privacy. I therefore do not consider disclosure would expose the business undertaking to disadvantage. In any case, even if it were to expose the undertaking to some disadvantage, I do not consider it would be unreasonable where it is in the public interest to disclose the document. In my view disclosure is in the public interest as it demonstrates the way in which the agency is carrying out its oversight function. I also consider that where a business undertaking participates in such programs, they should expect additional scrutiny. The document is therefore not exempt under section 34(1)(b).</p> <p>Section 34(4)(a)(ii): While the document is a business-like agreement, it involves the Agency meeting its governmental duties, being to regulate the provision of</p>

Doc No	Date	Description	Number of Pages	Agency decision	OVIC decision	OVIC comments
						commercial vehicle subsidies. I therefore do not consider the Agency is engaged in trade or commerce. The document is therefore not exempt under section 34(4)(a)(ii). Section 25: See comments for Document 1.
5	[date]	Email between DEDJTER officers re [business undertaking]'s submission	2	Released in part Section 25	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 25: See comments for Document 1. Note – the attachment to this document is at Document 19.
6	[date]	Email between CPV officers – response to [business undertaking]	2	Released in part Section 25	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 25: See comments for Document 1. Note – the attachment to this document is at Document 11.

Doc No	Date	Description	Number of Pages	Agency decision	OVIC decision	OVIC comments
7	Undated	Spreadsheet	2	Released in full	Not subject to review	
8	Undated	Discussion points on MPTP Proof of Concept	4	Refused in full Sections 30(1), 34(4)(a)(ii)	Release in full	Section 30(1): See comments for Document 1. Section 34(4)(a)(ii): See comments for Document 4. Note – the attachment to this document is at Document 9.
9	[date]	Email from CPV officer to [business undertaking]	1	Released in part Section 25	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 25: See comments for Document 1. This document has an attachment which is Document 8.
10	Undated	MPTP Expansion Program Management Plan - DRAFT	16	Released in part Sections 28(1)(d), 25	Release in part Sections 28(1)(d), 33(1), 25 The document is to be released with exempt and irrelevant information	Section 28(1)(d): The document contains the disclosure of a deliberation and decision of a subcommittee of cabinet. This information is therefore exempt under section 28(1)(d).

Doc No	Date	Description	Number of Pages	Agency decision	OVIC decision	OVIC comments
					deleted in accordance with section 25.	Section 25: See comments for Document 1.
11	[date]	Confidential leadership paper	3	Released in part Section 25	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 25: See comments for Document 1.
12	[date]	Steering committee overview report	3	Released in part Section 25	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 25: See comments for Document 1.
13	[date]	Emails between CPV officers- CPVV Implementation Committee	1	Released in part Section 25	Release in part Section 25 The document is to be released with irrelevant information deleted in	Section 25: See comments for Document 1.

Doc No	Date	Description	Number of Pages	Agency decision	OVIC decision	OVIC comments
					accordance with section 25.	
14	[date]	Email from CPV officer to [business undertaking]-points for discussion	4	Refused in full Sections 30(1), 35(1)(a) in conjunction with 34(4)(a)(ii), 25	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 30(1): The document contains a significant amount of factual information that is not exempt by way of section 30(3). For the remainder, see comments for Document 1. Section 35(1)(a) in conjunction with section 30(1): See comments for section 30(1) for Document 1. Section 34(4)(a)(ii): The document is not exempt under section 34(4)(a)(ii). See comments for Document 4. Section 25: See comments for Document 1.
15	Undated	Speaking notes to industry participants	1	Released in full	Not subject to review	
16	Undated	Speaking notes to MP's	1	Released in full	Not subject to review	

Doc No	Date	Description	Number of Pages	Agency decision	OVIC decision	OVIC comments
17	[date]	Letter from Taxi Services Commission to [business undertaking]	1	Released in part Section 25	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 25: See comments for Document 1.
18	[date]	Letter from CPVV to [business undertaking]	1	Released in part Section 25	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 25: See comments for Document 1.
19	[date]	[business undertaking] MPTP Response to CPVV	24	Refused in full Section 34(1)(b)	Release in full	Section 34(1)(b): This document is information provided to the Agency by a business undertaking and is marked 'commercial in confidence'. However, I note much of the information is general in nature and some of which is publicly available. I also note the document advises, in relation to

Doc No	Date	Description	Number of Pages	Agency decision	OVIC decision	OVIC comments
						technical specifications, that it is provided at a high level only. From the information before me, I am not satisfied disclosure of the information would expose the undertaking unreasonably to disadvantage. Rather, for the reasons described in Document 4, I consider it is in the public interest to release the document.
FOI -02. How MPTP users were informed and targeted						
20	Undated	CPVV MPTP [business undertaking] trial invitation letter – Attachment A	1	Released in full	Not subject to review	
21	Undated	[business undertaking] MPTP trial now running in [location]- Attachment B	1	Released in full	Not subject to review	
22	Undated	[business undertaking] multi-purpose tax program trial Q&As	5	Released in full	Not subject to review	

Doc No	Date	Description	Number of Pages	Agency decision	OVIC decision	OVIC comments
23	Undated	CPVV Customer Services Communications Brief	6	Released in full	Not subject to review	
24	[date]	FW: [business undertaking] follow up: POC Implementation	3	Refused in full Sections 34(1)(b), 34(4)(a)(ii)	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 34(1)(b): The document contains information provided by a business undertaking to the Agency. In my view however, the document does not contain sufficient detail for its disclosure to expose the undertaking unreasonable to disadvantage. See also my comments for Documents 4 and 19. Section 34(4)(a)(ii): See comments for Document 4. Section 25: See comments for Document 1.
25	[date]	Email between CPVV officers	3	Release in part Section 25	Release in part Section 25 The document is to be released with irrelevant information deleted in	Section 25: See comments for Document 1.

Doc No	Date	Description	Number of Pages	Agency decision	OVIC decision	OVIC comments
					accordance with section 25.	
26	[date]	Email between CPVV officers	2	Released in part Section 25	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 25: See comments for Document 1.
FOI- 04. Rationale for MPTP trial during lockdown						
27	[date]	Letter from CPVV to [business undertaking]	1	Released in part Section 25	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 25: See comments for Document 1.
28	[date]	Re: Progressing [business undertaking] & MPTP Expansion Project	5	Released in part Section 25	Release in part Section 25 The document is to be released with irrelevant information deleted in	Section 25: See comments for Document 1.

Doc No	Date	Description	Number of Pages	Agency decision	OVIC decision	OVIC comments
					accordance with section 25.	
FOI – 05-06. Outcomes, results, conclusions of Trial						
29	Undated	Confidential commission paper	9	Refused in full Sections 30(1), 34(4)(a)(ii)	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 30(1): The document contains information in the nature of opinion, advice and recommendation produced during the deliberative processes of the agency – that of changing certain billing arrangements for a subsidy. However, given much of this information is publicly available, I do not consider it is sensitive, nor do I consider disclosure would have any impact on agency officers providing such advice in the future. I have therefore determined the document is not exempt under section 30(1). Section 34(4)(a)(ii): See comments for Document 4.

Doc No	Date	Description	Number of Pages	Agency decision	OVIC decision	OVIC comments
						Section 25: See comments for Document 1.
30	Undated	MPTP rules are changing - members	1	Release in full	Not subject to review	
31	Undated	MPTP rules are changing - Industry	1	Release in full	Not subject to review	
32	Undated	Confidential commission paper	6	Refused in full Section 30(1)	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 30(1): See comments for Document 29. Section 25: See comments for Document 1.
33	Undated	Application for Passenger Transport License Code	2	Release in full	Not subject to review	
34	Undated	CPVV Proof of Concept- [business undertaking] Evaluation Report	10	Releases in part Section 28(1)(d)	Release in part Sections 28(1)(d), 25 The document is to be released with exempt information deleted in accordance with section 25.	Section 28(1)(d): The document contains the disclosure of a deliberation and decision of a subcommittee of cabinet. This information is therefore exempt under section 28(1)(d). Section 25: I consider it is practicable to delete this

Doc No	Date	Description	Number of Pages	Agency decision	OVIC decision	OVIC comments
						exempt information from the document.
35	[date]	[business undertaking] MPTP Scheme- Full Roll-out Plan	15	Released in part Section 34(1)(b)	Release in full	Section 34(1)(b): See comments for Document 24.
36	[date]	Confidential executive management team paper	5	Released in part Sections 30(1), 25	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 30(1): The information in this document appears factual. In any case I do not consider it is sensitive nor that its disclosure would have any effect on the agency. It is therefore not exempt under section 30(1). Section 25: See comments for Document 1.
37	Undated	Excel table	1	Released in full	Not subject to review	
38	Undated	Excel table	1	Released in full	Not subject to review	
39	Undated	Excel table	1	Released in full	Not subject to review	
40	Undated	Excel table	1	Released in full	Not subject to review	
41	Undated	Excel table	1	Released in full	Not subject to review	
42	Undated	Excel table	1	Released in full	Not subject to review	
43	Undated	Excel table	1	Released in full	Not subject to review	
44	Undated	Excel table	1	Released in full	Not subject to review	

Doc No	Date	Description	Number of Pages	Agency decision	OVIC decision	OVIC comments
45	[date]	Email from [business undertaking] re MPTP Pilot Report – Period ending [date]	1	Refused in full Sections 34(1)(b), 34(4)(a)(ii)	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 34(1)(b): See comments for Document 4. Section 34(4)(a)(ii): See comments for Document 4. Section 25: See comments for Document 1. Note: The attachment to this email is Document 46 (starting Doc ID CPV.005.001.0039).
46	[date]	[business undertaking] MPTP Trial Report – Period ending [date]	9	Refused in full Sections 34(1)(b), 34(4)(a)(ii)	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 34(1)(b): See comments for Document 4. Section 34(4)(a)(ii): See comments for Document 4. Section 25: See comments for Document 1.
47	[date]	Email from [business undertaking] re MPTP Pilot Report- Period Ending [date]	1	Refused in full Sections 34(1)(b), 34(4)(a)(ii)	Release in part Section 25 The document is to be released with irrelevant information deleted in	Section 34(1)(b): See comments for Document 4. Section 34(4)(a)(ii): See comments for Document 4.

Doc No	Date	Description	Number of Pages	Agency decision	OVIC decision	OVIC comments
					accordance with section 25.	<p>Section 25: See comments for Document 1.</p> <p>Note: The attachment to this email is Document 47 (Starting Doc ID CPV.005.001.0041).</p>
48	[date]	[business undertaking] MPTP Trial Report- Period ending [date]	5	Refused in full Sections 34(1)(b), 34(4)(a)(ii)	<p>Release in part</p> <p>Section 25</p> <p>The document is to be released with irrelevant information deleted in accordance with section 25.</p>	<p>Section 34(1)(b): See comments for Document 4.</p> <p>Section 34(4)(a)(ii): See comments for Document 4.</p> <p>Section 25: See comments for Document 1.</p>
49	[date]	Email from [business undertaking] re MPTP Pilot Report- Period ending [date]	1	Refused in full Sections 34(1)(b), 34(4)(a)(ii)	<p>Release in part</p> <p>Section 25</p> <p>The document is to be released with irrelevant information deleted in accordance with section 25.</p>	<p>Section 34(1)(b): See comments for Document 4.</p> <p>Section 34(4)(a)(ii): See comments for Document 4.</p> <p>Section 25: See comments for Document 1.</p>

Doc No	Date	Description	Number of Pages	Agency decision	OVIC decision	OVIC comments
						Note: The attachment to this email is Document 50 (starting Doc ID CPV.005.001.0043).
50	[date]	[business undertaking] MPTP Trial Report- Period ending [date]	3	Refused in full Sections 34(1)(b), 34(4)(a)(ii)	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 34(1)(b): See comments for Document 4. Section 34(4)(a)(ii): See comments for Document 4. Section 25: See comments for Document 1.
51	[date]	Email from [business undertaking] re MPTP Pilot Report- Period ending [date]	1	Refused in full Sections 34(1)(b), 34(4)(a)(ii)	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 34(1)(b): See comments for Document 4. Section 34(4)(a)(ii): See comments for Document 4. Section 25: See comments for Document 1. Note: The attachment to this email is Document 52 (starting DOC ID CPV.005.001.0045).

Doc No	Date	Description	Number of Pages	Agency decision	OVIC decision	OVIC comments
52	[date]	[business undertaking] MPTP Trial Report- Period ending [date]	1	Refused in full Sections 34(1)(b), 34(4)(a)(ii)	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 34(1)(b): See comments for Document 4. Section 34(4)(a)(ii): See comments for Document 4. Section 25: See comments for Document 1.
53	[date]	Email from [business undertaking] re MPTP Pilot Report- Period Ending [date]	1	Refused in full Sections 34(1)(b), 34(4)(a)(ii)	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 34(1)(b): See comments for Document 4. Section 34(4)(a)(ii): See comments for Document 4. Section 25: See comments for Document 1. Note: The attachment to this email is Document 54 (starting Doc ID CPV.005.001.0047).
54	[date]	[business undertaking] MPTP Trial Report- Period ending [date]	7	Refused in full Sections 34(1)(b), 34(4)(a)(ii)	Release in part Section 25 The document is to be released with irrelevant	Section 34(1)(b): See comments for Document 4.

Doc No	Date	Description	Number of Pages	Agency decision	OVIC decision	OVIC comments
					information deleted in accordance with section 25.	Section 34(4)(a)(ii): See comments for Document 4. Section 25: See comments for Document 1.
55	[date]	Email from [business undertaking] re MPTP Pilot Report – Period Ending [date]	1	Refused in full Sections 34(1)(b), 34(4)(a)(ii)	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 34(1)(b): See comments for Document 4. Section 34(4)(a)(ii): See comments for Document 4. Section 25: See comments for Document 1. Note: The attachment to this email is Document 56 (starting DOC ID CPV.005.001.0049).
56	[date]	[business undertaking] MPTP Trial Report- Period ending [date]	4	Refused in full Sections 34(1)(b), 34(4)(a)(ii)	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 34(1)(b): See comments for Document 4. Section 34(4)(a)(ii): See comments for Document 4.

Doc No	Date	Description	Number of Pages	Agency decision	OVIC decision	OVIC comments
						Section 25: See comments for Document 1.
57	[date]	Email from [business undertaking] re MPTP Pilot Report- Period ending [date]	1	Refused in full Sections 34(1)(b), 34(4)(a)(ii)	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 34(1)(b): See comments for Document 4. Section 34(4)(a)(ii): See comments for Document 4. Section 25: See comments for Document 1. Note: The attachment to this email is Document 58 (starting Doc ID CPV.005.001.0051).
58	[date]	[business undertaking] MPTP Trial Report- period ending [date]	2	Refused in full Sections 34(1)(b), 34(4)(a)(ii)	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 34(1)(b): See comments for Document 4. Section 34(4)(a)(ii): See comments for Document 4. Section 25: See comments for Document 1.
59	[date]	Email between CPV officers- items for decision	2	Released in part Sections 30(1), 25	Release in part Section 25	Section 30(1): See comments for Document 36.

Doc No	Date	Description	Number of Pages	Agency decision	OVIC decision	OVIC comments
					The document is to be released with irrelevant information deleted in accordance with section 25.	Section 25: See comments for Document 1.
60	[date]	Satisfaction Survey	3	Released in full	Not subject to review	
FOI – 07. Ongoing arrangement b-t [business undertaking] and CPVV for MPTP						
61	[date]	CPVV [business undertaking] Deed of Agreement for MPTP Data Services dated [date]	32	Released in part Sections 34(1)(b), 34(4)(a)(ii), 25	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 34(1)(b): See comments for Document 4. Section 34(4)(a)(ii): See comments for Document 4. Section 25: See comments for Document 1.
FOI – 10. Information and BSPs and Industry						
62	[date]	Communications Plan	6	Released in part Section 25	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 25: See comments for Document 1.

Doc No	Date	Description	Number of Pages	Agency decision	OVIC decision	OVIC comments
63	[date]	Feedback from [external stakeholder] on MPTP and [business undertaking]	3	Released in part Section 25	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 25: See comments for Document 1.
64	[date]	Feedback from external stakeholder regarding MPTP and [business undertaking]	2	Released in part Section, 25	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 25: See comments for Document 1.
65	[date]	Feedback from MPTP member on [business undertaking] trial	2	Released in part Section 25	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 25: See comments for Document 1.
66	[date]	Latest blog updates regarding MPTP	5	Released in part Section 25	Release in part Section 25	Section 25: See comments for Document 1.

Doc No	Date	Description	Number of Pages	Agency decision	OVIC decision	OVIC comments
		and [business undertaking]			The document is to be released with irrelevant information deleted in accordance with section 25.	
67	[date]	Email between CPVV officers regarding advising external stakeholder	1	Released in part Section 25	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 25: See comments for Document 1.
68	[date]	Email from external stakeholder to CPVV regarding the [business undertaking] MPTP trial	2	Released in part Section 25	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 33(1): I agree the information deleted by the Agency under section 33(1) at the top of page 2 (with the reference CPV.010.001.0036) is information that could identify a person other than the Applicant, and that, given its sensitivity, it would be unreasonable to release it. Section 25: See comments for Document 1.

Doc No	Date	Description	Number of Pages	Agency decision	OVIC decision	OVIC comments
69	[date]	Email from external stakeholder re [business undertaking] offering subsidised trips	1	Released in part Section 25	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 25: See comments for Document 1.
70	[date]	Email from Carers Victoria to CPVV	2	Released in part Section 25	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 25: See comments for Document 1.
71	[date]	Email from Municipal Association of Victoria to CPVV	2	Released in part Section 25	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 25: See comments for Document 1.
FOI – 11. Evidence that Minister was informed of MPTP expansion						

Doc No	Date	Description	Number of Pages	Agency decision	OVIC decision	OVIC comments
72	[date]	Briefing to Minister Carroll	109	Released in part Sections 28(1)(d), 34(4)(a)(ii), 25	Release in part Sections 28(1)(b), 25 The document is to be released with exempt and irrelevant information deleted in accordance with section 25.	Section 28(1)(b): The document contains a submission to a subcommittee of cabinet. It is exempt under section 28(1)(b). Section 34(4)(a)(ii): See comments for Document 4. Section 30(1): For completeness I have considered whether section 30(1) applies where I have determined section 34(4)(a)(ii) does not apply. While I note the sensitive nature of some of the information, given the program has now been implemented, I do not consider disclosure will affect the Agency carrying out its functions to the extent disclosure would be contrary to the public interest. See also my comments in relation to Document 1. The information is therefore

Doc No	Date	Description	Number of Pages	Agency decision	OVIC decision	OVIC comments
						not exempt under section 30(1). Section 25: See comments for Document 1.
73	[date]	Briefing to Minister Horne	25	Released in part Section 25	Release in part Section 25 The document is to be released with irrelevant information deleted in accordance with section 25.	Section 25: See comments for Document 1.