

Notice of Decision and Reasons for Decision

Applicant:	'EX2'
Agency:	City of Port Phillip
Decision date:	22 November 2022
Exemption considered:	Section 32(1)
Citation:	'EX2' and City of Port Phillip (Freedom of Information) [2022] VICmr 239 (22 November 2022)

FREEDOM OF INFORMATION – tree root damage to dwelling – removal of trees – public liability insurance – correspondence with public liability and professional indemnity insurer – dominant purpose test

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 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 not satisfied information to which the Agency refused access under section 32(1) is exempt from release.

As I am satisfied it is practicable to provide the Applicant with an edited copy of the documents with irrelevant information deleted in accordance with section 25, 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.

A marked-up copy of Documents 1, 9 and 23 indicating irrelevant information in accordance with my decision has been provided to the Agency.

My reasons for decision follow.

Joanne Kummrow
Public Access Deputy Commissioner

22 November 2022

Reasons for Decision

Background to review

1. The Applicant's request relates to trees growing alongside their dwelling that have allegedly caused damage to the dwelling. The Applicant seeks access to various documents with respect to this matter.
2. The Applicant does not seek access to personal affairs information in the documents.
3. The Agency identified 164 documents falling within the terms of the Applicant's request and granted access to 133 documents in full and refused access to 27 documents in part and four documents in full under section 32(1).
4. The Agency's decision letter sets out the reasons for its decision.

Review application

5. The Applicant sought review by the Information Commissioner under section 49A(1) of the Agency's decision to refuse access.
6. I have examined a copy of the documents subject to review, being 27 documents released in part and the four documents refused in full. The remaining 133 documents released to the Applicant in full with personal affairs information deleted in accordance with section 25 are not subject to review and are not included in the Schedule of Documents in **Annexure 1**.
7. During the review, OVIC staff made inquiries with the Agency concerning potential missing attachments to the email threads subject to review. The Agency confirmed that all attachments to the email threads were located in response to the Applicant's request. Accordingly, no additional documents were located during the 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 conducting a review under section 49F, section 49P requires that I make a new or 'fresh decision'. Therefore, my review does not involve determining whether the Agency's decision is correct, but rather requires my fresh decision to be the 'correct or preferable decision'.¹ This involves ensuring my decision is correctly made under the FOI Act and any other applicable law in force at the time of my decision.

¹ *Drake v Minister for Immigration and Ethnic Affairs* (1979) 24 ALR 577 at 591.

Review of exemption

Section 32(1) – Documents affecting legal proceedings

13. Section 32(1) provides a document is an exempt document ‘if it is of such a nature that it would be privileged from production in legal proceedings on the ground of legal professional privilege or client legal privilege’.

Legal professional privilege

14. A document will be subject to legal professional privilege where it contains a confidential communication between:²
- (a) the client (or the client’s agent) and the client’s professional legal advisers, that was made for the dominant purpose of obtaining or providing legal advice or is referable to pending or contemplated litigation;
 - (b) the client’s professional legal advisers and third parties, that was made for the dominant purpose of pending or contemplated litigation; or
 - (c) the client (or the client’s agent) and third parties that was made for the purpose of obtaining information to be submitted to the client’s professional legal advisers for the dominant purpose of obtaining advice on pending or contemplated litigation.

Client legal privilege

15. A document will be subject to client legal privilege where it contains a ‘confidential communication’ between:
- (a) the client (or the client’s agent) and the client’s professional legal advisers, that was made for the dominant purpose of obtaining or providing legal advice;³ or
 - (b) the client and another person, which was made for the dominant purpose of the client being provided with professional legal services relating to a proceeding in which the client is or was a party.⁴
16. For convenience, I refer to ‘legal professional privilege’ and ‘client legal privilege’ as ‘legal privilege’ in this decision.
17. The High Court of Australia has observed the importance of legal privilege:

The rationale of this head of privilege, according to traditional doctrine, is that it promotes the public interest because it assists and enhances the administration of justice by facilitating the representation of clients by legal advisers, the law being a complex and complicated discipline. This it does by keeping secret their communications, thereby inducing the client to retain the solicitor and seek his advice, and encouraging the client to make a full and frank disclosure of the relevant circumstances to the solicitor.⁵

18. For legal professional privilege to apply, there must be a lawyer-client relationship.⁶

² *Graze v Commissioner of State Revenue* [2013] VCAT 869 at [29]; *Elder v Worksafe Victoria* [2011] VCAT 1029 at [22]. See also section 119 of the *Evidence Act 2008* (Vic).

³ Section 118 of the *Evidence Act 2008* (Vic).

⁴ Section 119 of the *Evidence Act 2008* (Vic).

⁵ *Grant v Downs* [1976] HCA 63; (1976) 135 CLR 674 at [19].

⁶ *Young v State Insurance Office* (1986) 1 VAR 267.

19. The dominant purpose for which the confidential communication was made will determine whether the exemption applies.⁷
20. Legal privilege exists to protect the confidentiality of communications between a lawyer and a client. Privilege will be lost where the client has acted in a way that is inconsistent with the maintenance of that confidentiality – for instance where the substance of the information has been disclosed with the client’s express or implied consent.⁸
21. The documents are communications between the Agency and a claims specialist from a service provider of the Agency’s insurer.
22. The Agency’s decision states:

The documents consist of confidential information received from our external professional legal advisors and were produced for the dominant purpose of providing legal advice to the Council. If released, the documents would disclose legal advice which has been communicated in confidence.
23. During the review, the Agency submitted the information is confidential and prepared by a person for the dominant purpose of obtaining legal advice in regard to litigation arising from a claim for insurance compensation.
24. The communications between the Agency and the claims specialist occurred following the Applicant’s request for the removal of trees growing alongside their dwelling, that the Applicant alleges to have caused structural damage to their dwelling (the **Applicant’s matter**). The Agency submits the claims specialist managed the Agency’s public liability claim involving the Applicant.
25. Having reviewed the documents, there is no evidence before me to establish there is a lawyer-client relationship between the Agency and the claims specialist. In this regard, the Agency submits a number of individuals employed by the service provider are qualified lawyers, however, it is unable to confirm if the claims specialist is a lawyer.
26. In any case, even if the claims specialist is a lawyer, having reviewed the documents and considered the context of the communications, I consider their dominant purpose was for the Agency to notify its insurer of the Applicant’s matter for the purpose of obtaining an indemnity. Accordingly, I consider the correspondence concerns claims management rather than legal advice.
27. There is no information before me to support the contention that the communications were for the dominant purpose of obtaining legal advice. For example, on whether the Agency is liable for the damage caused to the Applicant’s dwelling.
28. Partway through the Agency’s communications with the claims specialist, the Agency also received correspondence from the Applicant’s lawyer with respect to potential legal action. Accordingly, I have also considered whether communications between the Agency and the claims specialist, which occurred after contact from the Applicant’s lawyer, was made for the dominant purpose of obtaining legal advice with respect to pending or contemplated litigation or for the purpose of providing the Agency’s communications with its insurer to a lawyer for legal advice.
29. In my view, the subsequent correspondence was not for the dominant purpose of being provided with legal advice with respect to pending or contemplated litigation. Nor am I satisfied the communications between the Agency and the claims specialist were for the dominant purpose of being provided to a legal adviser to obtain legal advice in relation to a public liability claim.

⁷ *Esso Australia Resources Ltd v Commissioner of Taxation* (1999) 201 CLR 49.

⁸ Sections 122(2) and 122(3) of the *Evidence Act 2008* (Vic) (for client legal privilege); *Mann v Carnell* (1999) 201 CLR 1 at [28] (for legal professional privilege).

30. As I am satisfied the dominant purpose of the communications was to obtain indemnity for the Applicant's matter, I am not satisfied the documents are of such a nature that they would be privileged from production in legal proceedings on the ground of legal professional privilege or client legal privilege.
31. Accordingly, the documents are not exempt from release under section 32(1).
32. The Schedule of Documents in **Annexure 1** sets out my decision in relation to section 32(1).

Section 25 – Deletion of exempt or irrelevant information

33. Section 25 requires an agency to grant access to an edited copy of a document where it is practicable to delete exempt or irrelevant information and the applicant agrees to receiving such a copy.
34. Determining what is 'practicable' requires consideration of the effort and editing involved in making the deletions 'from a resources point of view'⁹ and the effectiveness of the deletions. Where deletions would render a document meaningless, they are not 'practicable' and release of the document is not required under section 25.¹⁰
35. The Agency has removed two categories of information in the documents on the basis of irrelevance:
 - (a) personal affairs information, specifically names, email addresses and telephone numbers; and
 - (b) information to which the Agency considers is not related to the Applicant, for example, information relating to the dwelling prior to the Applicant's ownership.
36. With respect to the first category, I agree such information falls outside of the terms of the Applicant's request as they advised the Agency they do not seek access to personal affairs information of third parties.
37. With respect to the second category of information, I consider further information can be released as the information was communicated in relation to, and for the purpose of, the Applicant's matter and is not wholly personal affairs information of third parties. As such, I consider this information is relevant to the Applicant's request and is to be released with personal affairs information deleted.
38. As I am satisfied it is practicable to provide the Applicant with an edited copy of the documents with irrelevant information deleted in accordance with section 25, because it will not take substantial time or effort and the documents will retain meaning, access to the documents is granted in part.
39. The Schedule of Documents is **Annexure 1** sets out my decision on section 25.

Conclusion

40. On the information before me, I am not satisfied information in the documents is exempt from release under section 32(1).
41. As I am satisfied it is practicable to provide the Applicant with an edited copy of the documents with irrelevant information deleted in accordance with section 25, access is granted in part.
42. A marked-up copy of Documents 1, 9 and 23 indicating irrelevant information in accordance with my decision has been provided to the Agency.

⁹ *Mickelborough v Victoria Police (General)* [2009] VCAT 2786 at [31]; *The Herald and Weekly Times Pty Limited v The Office of the Premier (General)* [2012] VCAT 967 at [82].

¹⁰ *Honeywood v Department of Human Services* [2006] VCAT 2048 at [26]; *RFJ v Victoria Police FOI Division (Review and Regulation)* [2013] VCAT 1267 at [140] and [155].

Review rights

43. If either party to this review is not satisfied with my decision, they are entitled to apply to the Victorian Civil and Administrative Tribunal (**VCAT**) for it to be reviewed.¹¹
44. The Applicant may apply to VCAT for a review up to 60 days from the date they are given this Notice of Decision.¹²
45. The Agency may apply to VCAT for a review up to 14 days from the date it is given this Notice of Decision.¹³
46. 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.
47. 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.¹⁴

When this decision takes effect

48. My decision does not take effect until the Agency's 14 day review period expires.
49. If a review application is made to VCAT, my decision will be subject to any VCAT determination.

¹¹ The Applicant in section 50(1)(b) and the Agency in section 50(3D).

¹² Section 52(5).

¹³ Section 52(9).

¹⁴ Sections 50(3F) and 50(3FA).

Annexure 1 – Schedule of Documents

Document No.	Date of Document	Agency reference	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
1.	[Date]	[Reference number]	Email thread	12	Released in part Sections 32(1), 25	<p>Release in part Section 25</p> <p>The document is to be released in accordance with the marked-up version provided to the Agency with this decision.</p>	<p>Section 32(1): I am not satisfied the document is exempt under section 32(1).</p> <p>Section 25: As the Applicant does not seek access to personal affairs information, such information, which includes names, email addresses and telephone numbers, is to remain deleted from the documents.</p> <p>I am satisfied it is practicable to provide an edited copy of the document with irrelevant personal affairs information deleted in accordance with section 25.</p>
2.	[Date]	[Reference number]	Email thread	12	Released in part Sections 32(1), 25	<p>Release in part Section 25</p> <p>The information exempted under section 32(1) is to be released, except for personal affairs information of third parties.</p> <p>The Agency is to refer to the marked-up version of</p>	<p>Sections 32(1) and 25: See comments for Document 1.</p>

Document No.	Date of Document	Agency reference	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
						<p>Document 1 for guidance on the personal affairs information to be deleted from this document.</p> <p>All of the attachments within the email thread, including in attached emails, are to be released to the Applicant.</p>	
3.	[Date]	[Reference number]	Email thread	3	Released in part Sections 32(1), 25	<p>Release in part Section 25</p> <p>The information exempted under section 32(1) is to be released, except for personal affairs information of third parties.</p> <p>The Agency is to refer to the marked-up version of Document 1 for guidance on the personal affairs information to be deleted from this document.</p>	Sections 32(1) and 25: See comments for Document 1.
4.	[Date]	[Reference number]	Email thread	3	Released in part Sections 32(1), 25	<p>Release in part Section 25</p>	Sections 32(1) and 25: See comments for Document 1.

Document No.	Date of Document	Agency reference	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
						<p>The information exempted under section 32(1) is to be released, except for personal affairs information of third parties.</p> <p>The Agency is to refer to the marked-up version of Document 1 for guidance on the personal affairs information to be deleted from this document.</p>	
5.	[Date]	[Reference number]	Email thread	4	Released in part Sections 32(1), 25	<p>Release in part Section 25</p> <p>The information exempted under section 32(1) is to be released, except for personal affairs information of third parties.</p> <p>The Agency is to refer to the marked-up version of Document 1 for guidance on the personal affairs information to be deleted from this document.</p>	Sections 32(1) and 25: See comments for Document 1.

Document No.	Date of Document	Agency reference	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
6.	[Date]	[Reference number]	Email thread	4	Released in part Sections 32(1), 25	<p>Release in part Section 25</p> <p>The information exempted under section 32(1) is to be released, except for personal affairs information of third parties.</p> <p>The Agency is to refer to the marked-up version of Document 1 for guidance on the personal affairs information to be deleted from this document.</p>	Sections 32(1) and 25: See comments for Document 1.
7.	[Date]	[Reference number]	Email thread and attachment	9	Released in part Sections 32(1), 25	<p>Release in part Section 25</p> <p>The information exempted under section 32(1) is to be released, except for personal affairs information of third parties.</p> <p>The Agency is to refer to the marked-up version of Document 1 for guidance on the personal affairs</p>	Sections 32(1) and 25: See comments for Document 1.

Document No.	Date of Document	Agency reference	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
						information to be deleted from this document.	
8.	[Date]	[Reference number]	Email thread with attachments	77	Released in part Sections 32(1), 25	<p>Release in part Section 25</p> <p>The information exempted under section 32(1) is to be released, except for personal affairs information of third parties.</p> <p>The Agency is to refer to the marked-up version of Document 1 for guidance on the personal affairs information to be deleted from this document.</p>	Sections 32(1) and 25: See comments for Document 1.
9.	[Date]	[Reference number]	Email thread with attachments	57	Released in part Sections 32(1), 25	<p>Release in part Section 25</p> <p>The document is to be released in accordance with the marked up version provided to the Agency with this decision.</p>	<p>Sections 32(1): See comments for Document 1.</p> <p>Section 25: For the reasons provided in the Notice of Decision, above, I am satisfied information to which the Agency refused access on the basis of irrelevance is relevant to the Applicant's request. Accordingly, I have decided to release further</p>

Document No.	Date of Document	Agency reference	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
							information with personal affairs information deleted.
10.	[Date]	[Reference number]	Email thread	6	Released in part Sections 32(1), 25	<p>Release in part Section 25</p> <p>The information exempted under section 32(1) is to be released, except for personal affairs information of third parties.</p> <p>The Agency is to refer to the marked-up version of Document 1 for guidance on the personal affairs information to be deleted from this document.</p>	Sections 32(1) and 25: See comments for Document 1.
11.	[Date]	[Reference number]	Email thread	6	Released in part Sections 32(1), 25	<p>Release in part Section 25</p> <p>The information exempted under section 32(1) is to be released, except for personal affairs information of third parties.</p> <p>The Agency is to refer to the marked-up version of</p>	Sections 32(1) and 25: See comments for Document 1.

Document No.	Date of Document	Agency reference	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
						Document 1 for guidance on the personal affairs information to be deleted from this document.	
12.	[Date]	[Reference number]	Email thread	7	Released in part Sections 32(1), 25	<p>Release in part Section 25</p> <p>The information exempted under section 32(1) is to be released, except for personal affairs information of third parties.</p> <p>The Agency is to refer to the marked-up version of Document 1 for guidance on the personal affairs information to be deleted from this document.</p>	Sections 32(1) and 25: See comments for Document 1.
13.	[Date]	[Reference number]	Email thread	7	Released in part Sections 32(1), 25	<p>Release in part Section 25</p> <p>The information exempted under section 32(1) is to be released, except for personal affairs information of third parties.</p>	Sections 32(1) and 25: See comments for Document 1.

Document No.	Date of Document	Agency reference	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
						The Agency is to refer to the marked-up version of Document 1 for guidance on the personal affairs information to be deleted from this document.	
14.	[Date]	[Reference number]	Email thread	8	Released in part Sections 32(1), 25	Release in part Section 25 The information exempted under section 32(1) is to be released, except for personal affairs information of third parties. The Agency is to refer to the marked-up version of Document 1 for guidance on the personal affairs information to be deleted from this document.	Sections 32(1) and 25: See comments for Document 1.
15.	[Date]	[Reference number]	Email thread	8	Released in part Sections 32(1), 25	Release in part Section 25 The information exempted under section 32(1) is to be released, except for personal	Sections 32(1) and 25: See comments for Document 1.

Document No.	Date of Document	Agency reference	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
						<p>affairs information of third parties.</p> <p>The Agency is to refer to the marked-up version of Document 1 for guidance on the personal affairs information to be deleted from this document.</p>	
16.	[Date]	[Reference number]	Email thread	6	Released in part Sections 32(1), 25	<p>Release in part Section 25</p> <p>The information exempted under section 32(1) is to be released, except for personal affairs information of third parties.</p> <p>The Agency is to refer to the marked-up version of Document 1 for guidance on the personal affairs information to be deleted from this document.</p>	Sections 32(1) and 25: See comments for Document 1.
17.	[Date]	[Reference number]	Email thread	7	Released in part Sections 32(1), 25	<p>Release in part Section 25</p> <p>The information exempted under section</p>	Sections 32(1) and 25: See comments for Document 1.

Document No.	Date of Document	Agency reference	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
						<p>32(1) is to be released, except for personal affairs information of third parties.</p> <p>The Agency is to refer to the marked-up version of Document 1 for guidance on the personal affairs information to be deleted from this document.</p>	
18.	[Date]	[Reference number]	Email thread	6	Released in part Sections 32(1), 25	<p>Release in part Section 25</p> <p>The information exempted under section 32(1) is to be released, except for personal affairs information of third parties.</p> <p>The Agency is to refer to the marked-up version of Document 1 for guidance on the personal affairs information to be deleted from this document.</p>	Sections 32(1) and 25: See comments for Document 1.
19.	[Date]	[Reference number]	Multiple email threads	14	Released in part Sections 32(1), 25	<p>Release in part Section 25</p>	Sections 32(1) and 25: See comments for Document 1.

Document No.	Date of Document	Agency reference	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
						<p>The information exempted under section 32(1) is to be released, except for personal affairs information of third parties.</p> <p>The Agency is to refer to the marked-up version of Document 1 for guidance on the personal affairs information to be deleted from this document.</p>	
20.	[Date]	[Reference number]	Email thread	8	Released in part Sections 32(1), 25	<p>Release in part Section 25</p> <p>The information exempted under section 32(1) is to be released, except for personal affairs information of third parties.</p> <p>The Agency is to refer to the marked-up version of Document 1 for guidance on the personal affairs information to be deleted from this document.</p>	Sections 32(1) and 25: See comments for Document 1.

Document No.	Date of Document	Agency reference	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
21.	[Date]	[Reference number]	Email thread	2	Refused in full Section 32(1)	<p>Release in part Section 25</p> <p>The information exempted under section 32(1) is to be released, except for personal affairs information of third parties.</p> <p>The Agency is to refer to the marked-up version of Document 1 for guidance on the personal affairs information to be deleted from this document.</p>	Sections 32(1) and 25: See comments for Document 1.
22.	[Date]	[Reference number]	Email thread	8	Released in part Sections 32(1), 25	<p>Release in part Section 25</p> <p>The information exempted under section 32(1) is to be released, except for personal affairs information of third parties.</p> <p>The Agency is to refer to the marked-up version of Document 1 for guidance on the personal affairs</p>	Sections 32(1) and 25: See comments for Document 1.

Document No.	Date of Document	Agency reference	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
						information to be deleted from this document.	
23.	[Date]	[Reference number]	Email thread	9	Released in part Sections 32(1), 25	<p>Release in part Section 25</p> <p>The document is to be released in accordance with the marked-up version provided to the Agency with this decision.</p>	<p>Sections 32(1): See comments for Document 1.</p> <p>Section 25: I am satisfied some of the information the Agency deleted as irrelevant can be released because the information was communicated in relation to, and for the purpose of, the Applicant's matter and is not wholly personal affairs information of third parties. As such, I consider further information can be released.</p>
24.	[Date]	[Reference number]	Email thread	7	Released in part Sections 32(1), 25	<p>Release in part Section 25</p> <p>The information exempted under section 32(1) is to be released, except for personal affairs information of third parties.</p> <p>The Agency is to refer to the marked-up version of Document 1 for guidance</p>	<p>Sections 32(1) and 25: See comments for Document 1.</p>

Document No.	Date of Document	Agency reference	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
						on the personal affairs information to be deleted from this document.	
25.	[Date]	[Reference number]	Email thread	7	Released in part Sections 32(1), 25	<p>Release in part Section 25</p> <p>The information exempted under section 32(1) is to be released, except for personal affairs information of third parties.</p> <p>The Agency is to refer to the marked-up version of Document 1 for guidance on the personal affairs information to be deleted from this document.</p>	Sections 32(1) and 25: See comments for Document 1.
26.	[Date]	[Reference number]	Email thread	18	Released in part Sections 32(1), 25	<p>Release in part Section 25</p> <p>The information exempted under section 32(1) is to be released, except for personal affairs information of third parties.</p>	Sections 32(1) and 25: See comments for Document 1 and 25.

Document No.	Date of Document	Agency reference	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
						The Agency is to refer to the marked-up version of Document 1 for guidance on the personal affairs information to be deleted from this document.	
27.	[Date]	[Reference number]	Email thread	9	Released in part Sections 32(1), 25	<p>Release in part Section 25</p> <p>The information exempted under section 32(1) is to be released, except for personal affairs information of third parties.</p> <p>The Agency is to refer to the marked-up version of Document 1 for guidance on the personal affairs information to be deleted from this document.</p>	Sections 32(1) and 25: See comments for Document 1.
28.	[Date]	[Reference number]	Email	3	Refused in full Section 32(1)	<p>Release in part Section 25</p> <p>The information exempted under section 32(1) is to be released, except for personal</p>	Sections 32(1) and 25: See comments for Document 1.

Document No.	Date of Document	Agency reference	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
						<p>affairs information of third parties.</p> <p>The Agency is to refer to the marked-up version of Document 1 for guidance on the personal affairs information to be deleted from this document.</p>	
29.	[Date]	[Reference number]	Email thread	2	Refused in full Section 32(1)	<p>Release in part Section 25</p> <p>The information exempted under section 32(1) is to be released, except for personal affairs information of third parties.</p> <p>The Agency is to refer to the marked-up version of Document 1 for guidance on the personal affairs information to be deleted from this document.</p>	Sections 32(1) and 25: See comments for Document 1.
30.	[Date]	[Reference number]	Email thread	2	Refused in full Section 32(1)	<p>Release in part Section 25</p> <p>The information exempted under section</p>	Sections 32(1) and 25: See comments for Document 1.

Document No.	Date of Document	Agency reference	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
						<p>32(1) is to be released, except for personal affairs information of third parties.</p> <p>The Agency is to refer to the marked-up version of Document 1 for guidance on the personal affairs information to be deleted from this document.</p>	
31.	[Date]	[Reference number]	Email thread	18	Released in part Section 32(1)	<p>Release in part Section 25</p> <p>The information exempted under section 32(1) is to be released, except for personal affairs information of third parties.</p> <p>The Agency is to refer to the marked-up version of Document 1 for guidance on the personal affairs information to be deleted from this document.</p>	Sections 32(1) and 25: See comments for Document 1.