

## Notice of Decision and Reasons for Decision

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Applicant:	'F13'
Agency:	Swinburne University of Technology
Decision date:	7 August 2023
Exemption considered:	Section 33(1)
Citation:	'F13' and Swinburne University of Technology (Freedom of Information) [2023] VICmr 83 (7 August 2023)

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FREEDOM OF INFORMATION – political campaign – expression of interest for volunteers to undertake research or campaigning activities on behalf of a local political candidate in the lead up to the State election – ‘campaign-for-credits program’ – State election – work experience – internal correspondence – emails – personal affairs information – unreasonable to release

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 is the same as the Agency’s decision.

I am satisfied certain personal affairs information in the documents is exempt from release under section 33(1).

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

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

My reasons for decision follow.

Joanne Kummrow  
**Public Access Deputy Commissioner**

7 August 2023

## Reasons for Decision

### Background to review

1. On [date], the Applicant made a request to the Department of Education, requesting the following:

Please transfer to Swinburne University. I seek all documents, including emails, that relate to the Swinburne University campaign-for-credits program that would have awarded academic points to students assisting the campaign of a teal candidate in [suburb].

2. On [date] the Department of Education transferred the request to the Agency in accordance with section 18.

3. Following consultation with the Applicant and the Agency, the Applicant amended the terms of their request to:

Emails and/or Work Integrated learning Policy documents, related to the Work Integrated Learning opportunity within the Department of Humanities and Social Sciences at Swinburne, relating to or mentioning the campaign involving [named individual], the teal candidate for [suburb].

4. The Applicant excluded certain information being, emails, telephone numbers and addresses of third parties.
5. The Agency identified 48 documents falling within the terms of the Applicant's request and granted access to the documents in part under section 33(1). The Agency's decision letter sets out the reasons for its decision.

### Review application

6. The Applicant sought review by the Information Commissioner under section 49A(1) of the Agency's decision to refuse access.

### Information subject to review

7. The Applicant indicated in their review application that they seek review of the following information in the documents to which they were granted access in part:

- The sender of the email on page 1
- The contact person in the last paragraph on page 2
- The sender of the email chain at the top of page 5
- The sender of the email chain at the top of page 6
- The sender of the second last email in the chain of emails on page 6
- The sender of the last email in the chain of emails on page 6
- The senders of the first and last of the chain of emails on page 8
- The sender of the second last of the chain of emails on page 9
- The name of the [position title] redacted in the body of the email on page 11
- The third last and second last redactions on page 23
- The first redaction on page 24
- The last two redactions on page 26
- The first two redactions in the body of [named individual]'s email on page 31
- All of the redactions in document 10 from page 42 to page 47 of the released documents (and further that the university provide document 10 in a readable form)
- All of the redactions in the last email on page 59
- The sender of the first email of document 20 on page 75
- The sender of the first email on page 91 (document 24)
- The sender and recipient of the email on page 97 (document 26)
- The sender and recipient of the email on page 98 (document 27)

- The sender and recipient of the email in document 31 (page 113)
  - The sender and recipient of the email in document 33 (page 119)
  - The sender and recipient of the first email in document 40 (page 139)
  - The sender of the first email in document 42 (page 146)
  - The sender and recipient of the first email in document 43 (page 151)
8. In the documents provided to OVIC it was found, Document 42 commenced on page 147 and Document 43 on page 152. This is different to the documents provided to the Applicant. In consultation with the Applicant, it was confirmed that pages 147 and 152 are the pages for which the Applicant seeks a review.
  9. Accordingly, my review concerns the Agency's decision to refuse access under section 33(1) to the above information only.
  10. I have examined a copy of the documents subject to review.
  11. The Applicant and the Agency were invited to make a written submission under section 49H(2) in relation to the review.
  12. I have considered all communications and submissions received from the parties.
  13. 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.
  14. 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.
  15. 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'.<sup>1</sup> 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.

### **Review of the exemption in section 33(1)**

16. A document is exempt from release 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 (**a third party**);<sup>2</sup> and
  - (b) such disclosure would be 'unreasonable'
17. A document will disclose a third party's personal affairs information if it is capable, either directly or indirectly, of identifying that person. As the nature of disclosure under the FOI Act is unrestricted and unconditional this is to be interpreted by reference to the capacity of any member of the public to identify a third party.<sup>3</sup>

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<sup>1</sup> *Drake v Minister for Immigration and Ethnic Affairs* (1979) 24 ALR 577 at [591].

<sup>2</sup> Sections 33(1) and 33(2).

<sup>3</sup> *O'Sullivan v Department of Health and Community Services (No 2)* [1995] 9 VAR 1 at [14]; *Beauchamp v Department of Education* [2006] VCAT 1653 at [42].

*Do the documents contain a third party's personal affairs information of individuals?*

18. The Agency applied section 33(1) to names, position titles and academic qualifications of third parties.

19. I am satisfied the relevant information is personal affairs information as contemplated by section 33.

*Would disclosure of the personal affairs information be unreasonable?*

20. The concept of 'unreasonable disclosure' involves balancing the public interest in the disclosure of official information with the interest in protecting an individual's right to personal privacy in the circumstances.

21. Whether or not an agency officer's personal affairs information is exempt from release under section 33(1) must be considered in the context, taking into account the particular circumstances of each matter.<sup>4</sup>

22. Moreover, the proper application of section 33(1) involves consideration of 'all matters relevant, logical and probative to the existence of conditions upon which the section is made to depend'.<sup>5</sup>

23. In determining whether disclosure of the personal affairs information of third parties would be unreasonable in the circumstances, I have considered the following factors:

(a) The nature of the personal affairs information and the circumstances in which it was obtained

While, generally, there may be nothing particularly sensitive about identifying an individual undertaking duties in their professional capacity; nevertheless, there is no absolute rule as to how the exemption under section 33(1) may apply to an individual referred to in documents where the information recorded concerns them in their professional capacity.<sup>6</sup>

The third party personal affairs information under review is contained in internal emails relating to an expression of interest for student volunteers to undertake research or campaigning activities on behalf of a local political candidate in the lead up to the 2022 Victorian State election. I consider the personal affairs information was obtained by the Agency in the course of Agency officers' undertaking their professional work duties.

However, I note the subject matter of the review documents has received media attention concerning the Agency's potential involvement in the above-mentioned political campaigning activities. I also note from the documents, that a complaint was made to the State's integrity body. Considered in this context, I believe there are greater sensitivities associated with the release of the personal affairs information in the documents.

(b) The Applicant's interest in the information

The FOI Act provides a general right of access that can be exercised by any person, regardless of their motive or purpose for seeking access to a document. However, the reasons why an applicant seeks access to a document is a relevant consideration in determining whether disclosure would be unreasonable.<sup>7</sup>

I acknowledge the Applicant's interest in seeking release of further information in the documents in their capacity as the Shadow Special Minister of State concerned with

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<sup>4</sup> *Coulson v Department of Premier and Cabinet* (Review and Regulation) [2018] VCAT 229.

<sup>5</sup> *Victoria Police v Marke* [2008] VSCA 218 at [104].

<sup>6</sup> *Harrison v Police (Vic)* [2022] VCAT 280 at [138]-[148].

<sup>7</sup> *Victoria Police v Marke* [2008] VSCA 218 at [104].

scrutinising the Minister's role in overseeing public sector transparency, integrity and accountability.

(c) Whether any public interest would be promoted by release of the personal affairs information

I consider there are public interest factors both for and against disclosure in this case. I also note the importance of what's in the public interest and what may be of interest to the public are differing concepts.<sup>8</sup>

In their review application, the Applicant argues:

In the circumstances, where the behaviour of a limited number of academics from within the Department of Humanities and Social Sciences at Swinburne University was, in the opinion of their own Vice Chancellor, so reckless, unethical and conflicted that it will absolutely be perceived as partisan as well as entirely inappropriate, [the Applicant] contends the release of their names should not attract s33(1) protection. It is [the Applicant's] contention that these academics' actions have forfeited their right to privacy insofar as the release of their names only is concerned.

I acknowledge the Applicant's purpose for seeking access to the personal affairs information and the contentious issues raised in the documents.

It is accepted that public sector employees, including those employed by a public educational institution, are expected to withstand some level of public scrutiny in relation to carrying out their professional duties. However, such scrutiny must be carefully balanced with an individual's right to personal privacy given the potential for them to be subject to an unwarranted or inappropriate level of public attention or harassment if their personal affairs information, such as their name or position title, is disclosed under the FOI Act.

Having carefully reviewed the documents and considered the political and professional sensitivities surrounding their disclosure, I do not consider release of the third party personal affairs information is required to serve a public interest in 'clearing the air' regarding the issues discussed in the documents. In this regard, I note the Agency disclosed all substantive information in the documents to the Applicant, except for certain personal affairs information of third parties.

Nor do I consider the information before me calls for greater scrutiny in circumstances where the issue has been, or is, before an integrity body.

(d) Whether any individuals to whom the personal information relates would object to its release

The Agency's decision letter states:

The third parties whose personal affairs information is affected by this decision were consulted as required by section 33(2B) of the FO Act before this decision was made and a number expressly objected to the release of personal information.

A summary of the Agency's consultations was provided for my consideration. Having viewed the Agency's consultation document, I note a number of individuals object to the release of their personal affairs information under the FOI Act and in the circumstances of this matter, which has a political context. I also note that a number have concerns given what they consider was their peripheral or non-involvement in any student program, including merely being copied in on emails.

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<sup>8</sup> *Director of Public Prosecutions v Smith* [1991] VicRp 6; [1991] 1 VR 63, 74-76; *Gibson v Latrobe City Council* [2008] VCAT 1340 at [74].

(e) The likelihood of further disclosure of the information, if released

In considering the identity of the Applicant and their public role, I am satisfied it is reasonably likely the Applicant would disseminate the documents further, if released in full. Further, I note the Applicant's review application, which provides:

[The Applicant] further notes the names and positions of a number of Swinburne academics involved have already been made public in media reports of the issue, including one [named individual], a tutor in the Department of Social Sciences, Associate Professor [named individual] and Professor [named individual], Department Chair of Social Sciences.

The extent of disclosure of the personal affairs information is to be considered where circumstances of a case call for such considerations.<sup>9</sup>

The likelihood that the Applicant will disseminate the third party personal affairs information is an important factor for this case, noting the context of the documents. I acknowledge the concerns of certain third parties around the possibility of having their names published online and possible personal repercussions that may result from further public and media attention.

(f) Whether disclosure of the information would or would be reasonably likely to endanger the life or physical safety of any person

I must consider whether disclosure of the personal affairs information would or would be reasonably likely to endanger the life or physical safety of any person.<sup>10</sup> The term 'any person' is broad and extends to any relevant endangerment involving the safety of an applicant, a related third party or any other person.

I note certain third parties, through the Agency's consultation, raised concerns regarding safety given the possibility of further media attention. Therefore, I have had particular regard to the views of the relevant third parties regarding disclosure of their personal affairs information and their feelings of personal safety in my decision.

24. Having weighed up the above factors, on balance, I am satisfied disclosure of the personal affairs information of third parties in the documents would be unreasonable for the following reasons:

- (a) As noted by the documents, the issue raised in the documents was addressed by an integrity body.
- (b) The substantive information in the documents was released by the Agency to the Applicant and release of the names of individuals is not necessary to understand the nature and content of the documents. In a number of cases, the names in the documents do not indicate that all those named were directly involved in the student volunteer program.
- (c) In the circumstances, it is reasonable to conclude that there is a potential for the third parties' personal affairs information being subject to dissemination and media attention. In such circumstances, I have given weight to the views of the third parties and the likelihood of them being publicly named in relation to the student volunteer program, but with limited ability to respond as individuals to any likely resultant media or other public commentary.
- (d) There is no information before me to suggest greater public scrutiny is warranted or required to assist the public's understanding of the documents or the student volunteer program.

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<sup>9</sup> *Davies v Victoria Police (Review and Regulation)* [2022] VCAT 713 at [57].

<sup>10</sup> Section 33(2A).

## **Section 25 – Deletion of exempt or irrelevant information**

25. 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.
26. Determining what is ‘practicable’ requires consideration of the effort and editing involved in making the deletions ‘from a resources point of view’<sup>11</sup> 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.<sup>12</sup>
27. I have considered the information the Agency deleted from the documents as irrelevant. I am satisfied the information is irrelevant, being the personal affairs information excluded by the Applicant.
28. I have considered the effect of deleting irrelevant and exempt information from the documents. Given the Agency’s original decision to grant access to the documents in part with exempt and irrelevant information deleted in accordance with section 25, I am satisfied it remains practicable to provide the Applicant with an edited copy of the documents.

## **Conclusion**

29. On the information before me, I am satisfied certain information in the documents subject to review is exempt from release under section 33(1) and it is practicable to provide the Applicant with an edited copy of the documents with exempt and irrelevant information deleted in accordance with section 25.
30. The Schedule of Documents in **Annexure 1** sets out my decision in relation to each document.

## **Review rights**

31. If either party to this review is not satisfied with my decision, they are entitled to apply to VCAT for it to be reviewed.<sup>13</sup>
32. The Applicant may apply to VCAT for a review up to 60 days from the date they are given this Notice of Decision.<sup>14</sup>
33. The Agency may apply to VCAT for a review up to 14 days from the date it is given this Notice of Decision.<sup>15</sup>
34. Information about how to apply to VCAT is available online at [www.vcat.vic.gov.au](http://www.vcat.vic.gov.au). Alternatively, VCAT may be contacted by email at [admin@vcat.vic.gov.au](mailto:admin@vcat.vic.gov.au) or by telephone on 1300 018 228.
35. 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.<sup>16</sup>

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<sup>11</sup> *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].

<sup>12</sup> *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].

<sup>13</sup> The Applicant in section 50(1)(b) and the Agency in section 50(3D).

<sup>14</sup> Section 52(5).

<sup>15</sup> Section 52(9).

<sup>16</sup> Sections 50(3F) and 50(3FA).

Annexure 1 – Schedule of Documents

Document No.	Date of Document	Document Description	No. of pages	Agency Decision	Information subject to review	OVIC Decision	OVIC Comments
1	[date] 2022	Email chain – internal	2	Released in part Sections 33(1), 25	<ul style="list-style-type: none"> <li>The sender of the email on page 1</li> <li>The contact person in the last paragraph on page 2</li> </ul>	Release in part Sections 33(1), 25	<p><b>Section 33(1):</b> Having considered the circumstances of this matter, and for the reasons set out in the Notice of Decision above, I am satisfied disclosure of the third party personal affairs information to which the Agency refused access would be unreasonable and is exempt from release under section 33(1).</p> <p><b>Section 25:</b> Given the Agency’s original decision to grant access to the document in part with exempt information deleted in accordance with section 25, I am satisfied it remains practicable to provide the Applicant with an edited copy of the document.</p>
2	[date] 2022	Canvas Announcement	2	Released in part Sections 33(1), 25		Not subject to review	



Document No.	Date of Document	Document Description	No. of pages	Agency Decision	Information subject to review	OVIC Decision	OVIC Comments
3	[date] 2022	Email chain - internal	6	Released in part Sections 33(1), 25	<ul style="list-style-type: none"> <li>The sender of the email chain at the top of page 5</li> <li>The sender of the email chain at the top of page 6</li> <li>The sender of the second last email in the chain of emails on page 6</li> <li>The sender of the last email in the chain of emails on page 6</li> <li>The senders of the first and last of the chain of emails on page 8</li> <li>The sender of the second last of the chain of emails on page 9</li> </ul>	Release in part Sections 33(1), 25	See comments for Document 1.
4	[date] 2022	Canvas Announcement	2	Released in part Sections 33(1), 25	<ul style="list-style-type: none"> <li>The name of the [position title] coordinator redacted in the body of the email on page 11</li> </ul>	Release in part Sections 33(1), 25	See comments for Document 1.

Document No.	Date of Document	Document Description	No. of pages	Agency Decision	Information subject to review	OVIC Decision	OVIC Comments
5	[date] 2022	Email chain – internal	2	Released in part Sections 33(1), 25		Not subject to review	
6	[date] 2022	Email chain – internal	8	Released in part Sections 33(1), 25		Not subject to review	
7	[date] 2022	Email chain – internal	5	Released in part Sections 33(1), 25	<ul style="list-style-type: none"> <li>• The third last and second last redactions on page 23</li> <li>• The first redaction on page 24</li> <li>• The last two redactions on page 26</li> </ul>	Release in part Sections 33(1), 25	See comments for Document 1.
8	[date] 2022	Email chain – internal	6	Released in part Sections 33(1), 25	<ul style="list-style-type: none"> <li>• First two redactions in the body of [name] email on page 31</li> </ul>	Release in part Sections 33(1), 25	See comments for Document 1.
9	[date] 2022	Email chain – internal	8	Released in part Sections 33(1), 25		Not subject to review	
10	[date] 2022	Email chain – external	6	Released in part Sections 33(1), 25	<ul style="list-style-type: none"> <li>• All of the redactions in Document 10 from page 42 to page 47 of the released documents</li> </ul>	Release in part Sections 33(1), 25	See comments for Document 1.

Document No.	Date of Document	Document Description	No. of pages	Agency Decision	Information subject to review	OVIC Decision	OVIC Comments
11	[date] 2022	Canvas Announcement	2	Released in part Sections 33(1), 25		Not subject to review	
12	[date] 2022	Email chain - external	2	Released in part Sections 33(1), 25		Not subject to review	
13	[date] 2022	Canvas Announcement	2	Released in part Sections 33(1), 25		Not subject to review	
14	[date] 2022	Email chain – internal	1	Released in part Sections 33(1), 25		Not subject to review	
15	[date] 2022	Email chain - internal	3	Released in part Sections 33(1), 25		Not subject to review	
16	[date] 2022	Email chain – internal	6	Released in part Sections 33(1), 25	<ul style="list-style-type: none"> <li>All of the redactions in the last email on page 59</li> </ul>	Release in part Sections 33(1), 25	See comments for Document 1.
17	[date] 2022	Teams meeting invite	2	Released in part Sections 33(1), 25		Not subject to review	
18	[date] 2022	Teams meeting invite	2	Released in part Sections 33(1), 25		Not subject to review	
19	[date] 2022	Email chain – internal	7	Released in part Sections 33(1), 25		Not subject to review	

Document No.	Date of Document	Document Description	No. of pages	Agency Decision	Information subject to review	OVIC Decision	OVIC Comments
20	[date] 2022	Email chain – external	1	Released in part Sections 33(1), 25	<ul style="list-style-type: none"> <li>The sender of the first email of Document 20 on page 75</li> </ul>	Release in part Sections 33(1), 25	See comments for Document 1.
21	[date] 2022	Email chain – external	6	Released in part Sections 33(1), 25		Not subject to review	
22	[date] 2022	Email chain – internal	2	Released in part Sections 33(1), 25		Not subject to review	
23	[date] 2022	Email chain – external	6	Released in part Sections 33(1), 25		Not subject to review	
24	[date] 2022	Email chain – external	4	Released in part Sections 33(1), 25	<ul style="list-style-type: none"> <li>The sender of the first email on page 91 (Document 24)</li> </ul>	Release in part Sections 33(1), 25	See comments for Document 1.
24a	Undated	Campaign Ad	1	Released in part Section 33(1)		Not subject to review	
25	[date] 2022	Email chain – internal	2	Released in part Sections 33(1), 25		Not subject to review	
26	[date] 2022	Email chain – internal	1	Released in part Sections 33(1), 25	<ul style="list-style-type: none"> <li>The sender and recipient of the email on page 97 (Document 26)</li> </ul>	Release in part Sections 33(1), 25	See comments for Document 1.

Document No.	Date of Document	Document Description	No. of pages	Agency Decision	Information subject to review	OVIC Decision	OVIC Comments
27	[date] 2022	Email chain – internal	6	Released in part Sections 33(1), 25	<ul style="list-style-type: none"> <li>The sender and recipient of the email on page 98 (Document 27)</li> </ul>	Release in part Sections 33(1), 25	See comments for Document 1.
28	[date] 2022	Email chain – internal	4	Released in part Sections 33(1), 25		Not subject to review	
29	[date] 2022	Email chain - internal	1	Released in part Sections 33(1), 25		Not subject to review	
30	[date] 2022	Email chain - internal	4	Released in part Sections 33(1), 25		Not subject to review	
31	[date] 2022	Email chain – internal	2	Released in part Sections 33(1), 25	<ul style="list-style-type: none"> <li>The sender and recipient of the email in Document 31 (page 113)</li> </ul>	Release in part Sections 33(1), 25	See comments for Document 1.
32	[date] 2022	Email chain – internal	4	Released in part Sections 33(1), 25		Not subject to review	
33	[date] 2022	Email chain – internal	3	Released in part Sections 33(1), 25	<ul style="list-style-type: none"> <li>The sender and recipient of the email in Document 33 (page 119)</li> </ul>	Release in part Sections 33(1), 25	See comments for Document 1.

Document No.	Date of Document	Document Description	No. of pages	Agency Decision	Information subject to review	OVIC Decision	OVIC Comments
34	[date] 2022	Email chain – internal	1	Released in part Sections 33(1), 25		Not subject to review	
35	[date] 2022	Email chain – internal	2	Released in part Sections 33(1), 25		Not subject to review	
36	[date] 2022	Email chain - internal	2	Released in part Sections 33(1), 25		Not subject to review	
36a	Undated	Attachment- Student Resume	2	Out of scope Section 25		Not subject to review	
37	[date] 2022	Email chain - internal	3	Released in part Sections 33(1), 25		Not subject to review	
38	[date] 2022	Email chain - internal	3	Released in part Sections 33(1), 25		Not subject to review	
39	[date] 2022	Email chain – external	4	Released in part Sections 33(1), 25		Not subject to review	
40	[date]2022	Email chain – external	3	Released in part Sections 33(1), 25	<ul style="list-style-type: none"> <li>The sender and recipient of the first email in Document 40 (page 139)</li> </ul>	Release in part Sections 33(1), 25	See comments for Document 1.

Document No.	Date of Document	Document Description	No. of pages	Agency Decision	Information subject to review	OVIC Decision	OVIC Comments
40a	Undated	Attachment-Summit Areas Overview	1	Released in part Section 33(1)		Not subject to review	
40b	[date] 2022	Attachment-Meeting re Campaign Video	238MB	Out of scope Section 25		Not subject to review	
41	[date] 2022	Email chain – external	3	Released in part Sections 33(1), 25		Not subject to review	
42	[date] 2022	Email chain – external	5	Released in part Sections 33(1), 25	<ul style="list-style-type: none"> <li>The sender of the first email in Document 42 (page 147)</li> </ul>	Release in part Sections 33(1), 25	See comments for Document 1.
43	[date] 2022	Email chain – external	4	Released in part Sections 33(1), 25	<ul style="list-style-type: none"> <li>The sender and recipient of the first email in Document 43 (page 152)</li> </ul>	Release in part Sections 33(1), 25	See comments for Document 1.
44	[date] 2022	Email chain – external	7	Released in part Sections 33(1), 25		Not subject to review	
45	[date] 2022	Email chain - internal	3	Released in part Sections 33(1), 25		Not subject to review	
46	[date] 2022	Email chain - internal	7	Released in part		Not subject to review	

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				Sections 33(1), 25			
47	[date] 2022	Canvas Announcement	2	Released in part Sections 33(1), 25		Not subject to review	
48	[date ]2022	Email chain - internal	2	Released in part Sections 33(1), 25		Not subject to review	