

Notice of Decision and Reasons for Decision

Applicant: 'FB7'
Agency: City of Casey
Decision date: 6 April 2023
Exemptions and provisions considered: Sections 30(1), 33(1), 25
Citation: 'FB7' and City of Casey (Freedom of Information) [2023] VICmr 24 (6 April 2023)

FREEDOM OF INFORMATION – council documents– [services provided to child] – personal affairs information of third parties – internal working documents – parent request for information relating to child – release contrary to the public interest – disclosure unreasonable

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.

I am satisfied certain information in the documents is exempt from release under sections 33(1) and 30(1).

Where I am satisfied it is practicable to provide the Applicant with an edited copy of a document with exempt information deleted in accordance with section 25, I have granted access to the document in part. Where it is not practicable to do so, access to the document is refused in full.

While my decision on the Applicant's request differs from the Agency's decision, in that I have determined to apply a different exemption to refuse access to information in the documents, the effect of my decision is that no further information is to be released to the Applicant.

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

6 April 2023

Reasons for Decision

Background to review

1. The Applicant made a request to the Agency seeking access to the following documents:

Emails, correspondence (typed or hand written), memos, reports, maps, films, diaries, microfiche, photographs, computer discs, tape recordings and videotapes, that relate to the [services provided to] my [child], [name] [date of birth] undertaken by [Agency officer name] or anyone else associated with City of Casey between the periods listed above.
2. The Agency identified 56 documents falling within the terms of the Applicant's request and refused access to the documents in full under sections 35(1)(a) and 35(1)(b). The Agency's decision letter sets out the reasons for its decision.

Review application

3. The Applicant sought review by the Information Commissioner under section 49A(1) of the Agency's decision to refuse access.
4. I have examined a copy of the documents subject to review.
5. The Applicant and the Agency were invited to make a written submission under section 49H(2) in relation to the review.
6. I have considered all communications and submissions received from the parties.
7. During the course of the review, the Agency made submissions in relation to the exemptions it sought to apply to the documents. The Agency provided OVIC with new versions of marked up copies of Documents 5, 9, 14, 19, 25 and 30, no longer seeking to apply section 35(1)(b) and finding certain information exempt under sections 30(1) and 33(1).
8. 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.
9. 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.
10. 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.

Review of exemptions

Section 33(1) – Documents affecting the personal privacy of third parties

11. A document is exempt from release under section 33(1) if two conditions are satisfied:

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

- (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**);² and
- (b) such disclosure would be 'unreasonable'.

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

- 12. 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 such information may be reasonably determined.³
- 13. 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.⁴
- 14. I am satisfied the documents include the personal affairs information of Agency officers and third parties. This includes Agency officer's names and position titles and other personal information provided to the Agency by third parties.
- 15. In relation to the attachments to Documents 52 to 56, I note they are general resources uploaded by the Agency to the Applicant's child's file. Although the content of the documents is not specific to the Applicant's child, I consider their disclosure would disclose details of the Agency's engagement with the Applicant's child.

Would disclosure of the personal affairs information be unreasonable?

- 16. The concept of 'unreasonable disclosure' involves balancing the public interest in the disclosure of official information with the interest in protecting a third party's personal privacy in the particular circumstances.
- 17. In *Victoria Police v Marke*,⁵ the Victorian Court of Appeal held there is 'no absolute bar to providing access to documents which relate to the personal affairs of others'. Further, the exemption under section 33(1) 'arises only in cases of unreasonable disclosure' and '[w]hat amounts to an unreasonable disclosure of someone's personal affairs will necessarily vary from case to case'.⁶ The Court further held, '[t]he protection of privacy, which lies at the heart of [section] 33(1), is an important right that the FOI Act properly protects. However, an individual's privacy can be invaded by a lesser or greater degree'.⁷
- 18. In determining whether disclosure of the personal affairs information 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

The documents were prepared in the context of the Applicant's child accessing services from the Agency, or where it would disclose the substance of engagements between the Applicant's child and the Agency. Certain documents were recorded following communications with the

² Sections 33(1) and 33(2).

³ Section 33(9).

⁴ *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].

⁵ [2008] VSCA 218 at [76].

⁶ *Ibid.*

⁷ *Ibid* at [79].

Applicant, and others were recorded following communications with third parties. Given the context of the services provided, I consider information in the documents is sensitive in nature.

I am satisfied individuals who provide information to the Agency in such circumstances would not expect it will be released to third parties under the FOI Act. I further note the Agency's Youth Services' Privacy Policy states its provision of youth services to young people is on a confidential basis.⁸

I also consider that the resources included as attachments, while publicly available, also indirectly disclose the substance of discussions between the Applicant and a third party.

I note the Applicant likely knows the identity of certain third parties who are named in the documents. Nevertheless, even where an applicant claims to know the identity of a third party, disclosure of the third party's personal affairs information under the FOI Act may still be unreasonable in the circumstances.⁹

(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 under section 33(1).¹⁰

There is limited information before me in relation to what the Applicant intends to do with the information if released.

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

While I note the Applicant's strong interest in obtaining access to documents that concern their child, I do not consider the public interest would be promoted by the release of the requested documents.

In my view, the public interest weighs against disclosure of sensitive personal affairs information where its disclosure may adversely affect the individual to which the documents relate and would be likely to undermine trust in the Agency to keep sensitive and personal information confidential.

(d) The likelihood of disclosure of information, if released

As the FOI Act does not place any restrictions on an applicant's use or dissemination of documents obtained under FOI, this is to be interpreted by reference to the capacity of any member of the public to identify a third party.¹¹

Accordingly, I have considered the likelihood of the personal affairs information in the document being disseminated, if disclosed, and the effects broader disclosure of this information would have on the privacy of the relevant third parties.

⁸ City of Casey, Casey Youth Services, Privacy Policy, Version 2 (26 May 2020) at [https://www.casey.vic.gov.au/sites/default/files/user-files/Casey%20Youth%20Services%20Privacy%20Policy%20\(1\)_1.pdf](https://www.casey.vic.gov.au/sites/default/files/user-files/Casey%20Youth%20Services%20Privacy%20Policy%20(1)_1.pdf).

⁹ *AB v Department of Education and Early Childhood Development* [2011] VCAT 1263 at [58]; *Akers v Victoria Police* [2003] VCAT 397.

¹⁰ *Victoria Police v Marke* [2008] VSCA 218 at [104].

¹¹ *Ibid* at [68].

While there is no evidence before me to suggest that further disclosure is intended, given the sensitive nature of the documents I must consider the potential effects of further disclosure could be detrimental to the parties concerned.

(e) Whether the individuals to whom the information relates object, or would be likely to object, to the release of the information

In deciding whether disclosure of a document would involve the unreasonable disclosure of a third party's personal affairs information, an agency must notify that person (or their next of kin, if deceased) an FOI request has been received for documents containing their personal information and seek their view as to whether disclosure of the document should occur.¹² However, this obligation does not arise including if it is not practicable to do so.¹³

There is no information before me to indicate the Agency undertook consultation with third parties, as required under section 33(2B). However, given the nature of the documents, it is likely the third parties would be reasonably likely to object to the release of their personal affairs information under the FOI Act.

While I have reviewed the document provided by the Applicant with their review application, I am not persuaded it establishes that disclosure of sensitive information about a third party would not be reasonable.

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

In determining whether the disclosure of a document would involve the unreasonable disclosure of information relating to the personal affairs of any person, I must consider whether the disclosure of the information would, or would be reasonably likely to, endanger the life or physical safety of any person.¹⁴ Having regard to the circumstances of this matter, I am not able to discount this as a relevant factor.

19. Having regard to the above factors, on balance, I am satisfied disclosure of most of the third party personal affairs information in the documents would be unreasonable in these circumstances. However, I note the Agency has identified certain documents that record communications with the Applicant, and no longer seeks to refuse access to some of that information. I agree with the Agency on this point, and have determined to release additional personal affairs information to the Applicant where I am satisfied it is not exempt from release.

20. The Schedule of Documents in **Annexure 1** outlines my decision in relation to section 33(1).

Section 30(1) – Internal working documents

21. 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;
- (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.

¹² Section 33(2B).

¹³ Section 33(2C).

¹⁴ Section 33(2A).

22. The exemption does not apply to purely factual material in a document.¹⁵
23. The term ‘officer of an Agency’ is defined in section 5(1). It includes a member of an agency, a member of an agency’s staff, and any person employed by or engaged on behalf of an agency, regardless of whether or not they are subject to the *Public Administration Act 2004* (Vic).

Do the documents 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?

24. It is not necessary for a document to be in the nature of opinion, advice or recommendation. Rather, the issue is whether release of the document would disclose matter of that nature.¹⁶
25. The Agency identified a small amount of information in Documents 14 and 30 that it determined is exempt from release under section 30(1). From my review of these documents, I am satisfied the relevant information constitutes the opinion of an Agency officer.

Were the documents 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?

26. The term ‘deliberative process’ is interpreted broadly and includes any of the processes of deliberation or consideration involved in the functions of an agency, Minister or government.¹⁷
27. In *Re Waterford and Department of Treasury (No.2)*,¹⁸ the former Victorian Administrative Appeals Tribunal held:

... “deliberative processes” [is] wide enough to include any of the processes of deliberation or consideration involved in the functions of an agency... In short, ...its thinking processes — the processes of reflection, for example, upon the wisdom and expediency of a proposal, a particular decision or a course of action.

28. I am satisfied the Agency officer’s opinion was recorded in the course of the Agency’s deliberative processes involved in the functions of the Agency, being the provision of youth services to a client.

Would disclosure of the documents be contrary to the public interest?

29. In deciding if release is contrary to the public interest, which requires a ‘process of the weighing against each other conflicting merits and demerits’.¹⁹
30. I must consider all relevant facts and circumstances remaining mindful the object of the FOI Act is to facilitate and promote the disclosure of information. In doing so, I have given weight to the following relevant factors:²⁰
- (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;

¹⁵ Section 30(3).

¹⁶ *Mildenhall v Department of Education* (1998) 14 VAR 87.

¹⁷ *Brog v Department of Premier and Cabinet* (1989) 3 VAR 201 at [208].

¹⁸ [1984] AATA 67; (1984) 5 ALD 588; 1 AAR 1 at [58].

¹⁹ *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].

²⁰ *Hulls v Victorian Casino and Gambling Authority* (1998) 12 VAR 483.

- (c) the stage of 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.
31. On balance, I am satisfied disclosure of the relevant information would be contrary to the public interest to release for the following reasons:
- (a) As stated above, I consider information recorded by Agency officers regarding a young person who has received [certain] services from the Agency is sensitive in nature particularly given the confidential setting in which the information is provided to and recorded by the Agency.
 - (b) I am satisfied the relevant information was created to record a point in time assessment conducted by the Agency officer, with the intention that the information remain internal and confidential.
 - (c) While Agency officers acting in this capacity are required to provide their opinions and comments with respect to providing and managing youth services to a client, in this context, I accept there is a strong public interest in them being able to record their deliberations or consultations for the purposes of carrying out the Agency's functions and informing other Agency officers without concern sensitive information will be disclosed under the FOI Act.
 - (d) I am satisfied the impact of routinely disclosing sensitive information of this nature would undermine the robustness of the Agency's processes in providing [nature of services] and youth services to young people.
 - (e) I am not satisfied disclosure of the information would result 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.
32. Accordingly, I am satisfied certain information in Documents 14 and 30 is exempt from release under section 30(1).
33. The Schedule of Documents in **Annexure 1** outlines my decision in relation to section 30(1).

Section 35(1)(b) – Information obtained in confidence

34. The Agency also relied on section 35(1)(b) in relation to Documents 1 to 4, 6 to 8, 10 to 13, 15 to 18, 20 to 24, 26 to 29 and 31 to 56. However, as I am satisfied the documents are exempt from release under section 33(1) it is not necessary for me to consider the Agency's application of this additional exemption to the documents.

Section 25 – Deletion of exempt or irrelevant information

35. 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.
36. Determining what is ‘practicable’ requires consideration of the effort and editing involved in making the deletions ‘from a resources point of view’²¹ 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 25.²²
37. Where I am satisfied it is practicable to provide the Applicant with an edited copy of a document with exempt information deleted in accordance with section 25, I have granted access to the document in part. Where it is not practicable to do so, as it would render the document meaningless, access to the document is refused in full.
38. The Schedule of Documents in **Annexure 1** outlines my decision in relation to section 25.

Conclusion

39. On the information before me, I am satisfied certain information in the documents is exempt from release under sections 30(1) and 33(1).
40. Where I am satisfied it is practicable to provide the Applicant with an edited copy of a document with exempt information deleted in accordance with section 25, I have granted access to the document in part. Where it is not practicable to do so, access to the document is refused in full.
41. The Schedule of Documents in **Annexure 1** sets out my decision in relation to each document.

Review rights

42. 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.²³
43. The Applicant may apply to VCAT for a review up to 60 days from the date they are given this Notice of Decision.²⁴
44. The Agency may apply to VCAT for a review up to 14 days from the date it is given this Notice of Decision.²⁵
45. 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.
46. 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.²⁶

²¹ *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].

²² *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].

²³ The Applicant in section 50(1)(b) and the Agency in section 50(3D).

²⁴ Section 52(5).

²⁵ Section 52(9).

²⁶ Sections 50(3F) and 50(3FA).

When this decision takes effect

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

Annexure 1 – Schedule of Documents

Document No.	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
1. <i>Page 1 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Section 33(1): I am satisfied the information in this document is the personal affairs information of third parties, and it would be unreasonable to disclose this information for the reasons outlined in the Notice of Decision above. Section 25: I am not satisfied it is practicable to provide the Applicant with an edited copy of this document with exempt information deleted in accordance with section 25.
2. <i>Page 2 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
3. <i>Page 3 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
4. <i>Page 4 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
5. <i>Page 5 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Release in part Sections 33(1), 25 The document is to be released in accordance	Sections 33(1): I am satisfied the document is exempt from release under section 33(1). My decision is the same as

Document No.	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
				with the marked-up copy provided to the Agency.	the Agency's marked up document provided during the review. Section 25: I am satisfied it is practicable to provide the Applicant with an edited copy of this document with exempt information deleted in accordance with section 25. Accordingly, access to the document is granted in part.
6. <i>Page 6 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
7. <i>Page 7 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
8. <i>Page 8 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
9. <i>Page 9 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Release in part Sections 33(1), 25 The document is to be released in accordance with the marked-up copy provided to the Agency.	Sections 33(1) and 25: See comments for Document 5.

Document No.	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
10. <i>Page 10 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
11. <i>Page 11 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
12. <i>Page 12 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
13. <i>Page 13 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
14. <i>Page 14 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Release in part Sections 30(1), 33(1), 25 The document is to be released in accordance with the marked-up copy provided to the Agency.	Sections 33(1) and 25: See comments for Document 5. Section 30(1): I am satisfied information in the document constitutes the opinion of an Agency officer. I am satisfied it would be contrary to the public interest to release this information for the reasons outlined in my Notice of Decision above.
15.	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.

Document No.	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
	<i>Page 15 of the original Agency release</i>				
16.	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
17.	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
18.	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
19.	File note	1	Refused in full Section 35(1)(b)	Release in part Sections 33(1), 25 The document is to be released in accordance with the marked-up copy provided to the Agency.	Sections 33(1) and 25: See comments for Document 5.
20.	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
21.	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.

Document No.	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
	<i>Page 21 of the original Agency release</i>				
22.	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
23.	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
24.	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
25.	File note	1	Refused in full Section 35(1)(b)	Release in part Sections 33(1), 25 The document is to be released in accordance with the marked-up copy provided to the Agency.	Sections 33(1) and 25: See comments for Document 5.
26.	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
27.	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.

Document No.	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
	<i>Page 27 of the original Agency release</i>				
28.	File note	2	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
29.	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
30.	File note	1	Refused in full Section 35(1)(b)	Release in part Sections 30(1), 33(1), 25 The document is to be released in accordance with the marked-up copy provided to the Agency.	Section 33(1): I am satisfied this document is the personal affairs information of a third party. I am not satisfied it would be unreasonable to release certain information in the document for the reasons outlined in my Notice of Decision above. Section 30(1): See comments for Document 14. Section 25: See comments for Document 5.
31.	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.

Document No.	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
32. <i>Page 33 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
33. <i>Page 34 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
34. <i>Page 35 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
35. <i>Page 36 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
36. <i>Page 37 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
37. <i>Page 38 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
38. <i>Page 39 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.

Document No.	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
39. <i>Page 40 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
40. <i>Page 41 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
41. <i>Page 42 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
42. <i>Page 43 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
43. <i>Page 44 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
44. <i>Page 45 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
45. <i>Page 46 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.

Document No.	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
46. <i>Page 47 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
47. <i>Page 48 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
48. <i>Page 49 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
49. <i>Page 50 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
50. <i>Page 51 of the original Agency release</i>	File note	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
51. <i>Pages 52-54 of the original Agency release</i>	Summary details	3	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.
52. <i>Page 55 of original Agency release</i>	Portal cover sheet for attachment	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1.

Document No.	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
					<u>Attachment</u> Sections 33(1) and 25: See comments for Document 1.
53. <i>Page 56 of original Agency release</i>	Portal cover sheet for attachment	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1. <u>Attachment</u> Sections 33(1) and 25: See comments for Document 1.
54. <i>Page 57 of original Agency release</i>	Portal cover sheet for attachment	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1. <u>Attachment</u> Sections 33(1) and 25: See comments for Document 1.
55. <i>Page 58 of original Agency release</i>	Portal cover sheet for attachment	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1. <u>Attachment</u> Sections 33(1) and 25: See comments for Document 1.
56. <i>Page 59 of original Agency release</i>	Portal cover sheet for attachment	1	Refused in full Section 35(1)(b)	Refuse in full Section 33(1)	Sections 33(1) and 25: See comments for Document 1. <u>Attachment</u> Sections 33(1) and 25: See comments for Document 1.