



Australian Government

Department of Health and Aged Care

FOI reference: FOI 25-0032 LD

Andrew

Via Right to Know: foi+request-12097-86eb53d6@righttoknow.org.au

Dear Andrew,

Decision on your Freedom of Information Request

I refer to your information access request of 29 September 2024 made to the Department of Health and Aged Care (the department) under the *Freedom of Information Act 1982 (Cth)* (FOI Act). In your request, you sought access to:

Information pertaining to the methodology used or relied on by the CDNA, NNDSS or the AHPPC for COVID-19 surveillance from 2019-present day? Specifically with regard to how these bodies classify and report on:

- "COVID-19 cases"
- "COVID-19 hospitalisations"
- "COVID-19 ICU admissions"
- "COVID-19 deaths"

Could you please provide historical documents of how this methodology or guidance may have changed from 2019-present.

I am authorised under subsection 23(1) of the FOI Act to make decisions in relation to Freedom of Information requests. I am writing to notify you of my decision on your access request.

Consultation on scope of request

On 1 October 2024, the department contacted you by email to consult you on the scope of your request.

On this same day, you agreed to the department's interpretation of the scope of your request as follows:

Historical documents of how the below methodology or guidance used or relied on by the CDNA, NNDSS or the AHPPC for COVID-19 surveillance may have changed from 2019-29 September 2024. Specifically with regard to how these bodies classify and report on:

- "COVID-19 cases"

- "COVID-19 hospitalisations"
- "COVID-19 ICU admissions"
- "COVID-19 deaths"

On 4 October 2024, the department contacted you via section 24AB of the FOI Act to consult you on the scope of your request.

On 7 October 2024, you agreed to modify the scope of your request to the following:

Information showing the methodology/guidance suggested/given by the CDNA, NNDSS or the AHPPC for COVID-19 surveillance should be conducted relating to the classification and reporting of:

- "COVID-19 cases";
- "COVID-19 hospitalisations";
- "COVID-19 ICU admissions"; and
- "COVID-19 deaths".

At the time of the declaration of the pandemic in Australia, on or around 21/01/2020.

Reasonable searches

The department has conducted reasonable searches for documents in scope of your request. As per the FOI Guidelines [at 3.89], these searches were undertaken with reference to:

- the subject matter of your request
- the department's current and past file management systems
- the department's record management systems
- the individuals within the department with knowledge of the subject matter of the documents, or who could assist with location of documents
- the age of the documents.

I am satisfied that the searches undertaken were both thorough and reasonable in the context of the scope of your request, the resources of the department, and the requirements of the FOI Act and FOI Guidelines.

Decision on access

I have identified six documents that are relevant to your request.

These documents were in the possession of the department when your request was received.

I have decided to grant access to three documents in full, and grant access to three documents in part, subject to the deletion of exempt material.

A schedule setting out the documents relevant to your request, with my decision in relation to those documents, is at **ATTACHMENT A**.

My reasons for not providing access to material that has been deleted from the documents are set out in **ATTACHMENT B**.

Legislative provisions

The FOI Act, including the provisions referred to in my decision, is available on the Federal Register of Legislation website: www.legislation.gov.au/Series/C2004A02562.

The *Privacy Act 1988* (Cth) (Privacy Act), can also be accessed from the Federal Register of Legislation website here: www.legislation.gov.au/Series/C2004A03712.

Your review rights

I have set out your review rights at **ATTACHMENT C**.

Publication

Where I have decided to release documents to you, the department may also publish the released material on its Disclosure Log, as required by section 11C of the FOI Act. The department will not publish personal or business affairs information where it would be unreasonable to do so.

For your reference the department's Disclosure Log can be found at: www.health.gov.au/resources/foi-disclosure-log.

Contacts

If you require clarification of any matters discussed in this letter you can contact the FOI Section on (02) 6289 1666 or at FOI@health.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Emma Denehy', written over a horizontal line.

Emma Denehy
Assistant Secretary
Public Health & Surveillance Branch
29 October 2024

ATTACHMENT A.

SCHEDULE OF DOCUMENTS

FOI REQUEST 25-0032 LD

Document	Pages	Date	Description	Decision on access	Relevant provision/s of FOI Act
1	27	24 July 2015	Middle East Respiratory Syndrome Coronavirus CDNA National Guidelines for Public Health Units	Release in full	
2	14	18 March 2016	NNDSS Core Dataset Field Specifications - Version 10	Exempt in part	s47F
3	91	20 January 2020	CDNA JEG Extra Ordinary Meeting Agenda Papers	Exempt in part	s22 s47E(c) s47E(d) s47F
4	6	20 January 2020	CDNA Extra Ordinary Teleconference Summary Notes	Exempt in part	s47E(c) s47F
5	10	22 January 2020	Novel Coronavirus 2019 (2019-nCoV) CDNA National Guidelines for Public Health Units	Release in full	
6	11	23 January 2020	Novel Coronavirus 2019 (2019-nCoV) CDNA National Guidelines for Public Health Units	Release in full	

ATTACHMENT B.

**REASONS FOR DECISION
FOI REQUEST 25-0032 LD**

Material taken into account

In making my decision, I had regard to the following:

- the FOI Act
- guidelines issued by the Australian Information Commissioner under section 93A of the FOI Act (FOI Guidelines)
- the terms of your FOI request as outlined above
- the content of the documents sought, and
- advice from departmental officers with responsibility for matters relating to the documents sought.

1. Finding of facts and reasons for decision

My findings of fact and reasons for deciding that the exemptions identified in the schedule of documents apply to the parts of documents are set out below.

2. Section 22 - deletion of irrelevant and exempt material

Section 22 of the FOI Act applies to documents containing exempt material (subparagraph 22(1)(a)(i)) and irrelevant information (subparagraph 22(1)(a)(ii)) and allows an agency to delete such material from a document.

I have deleted material in the documents which can reasonably be regarded as irrelevant to your request and prepared an edited copy for release. This information has been marked 's22' in the documents released to you. This information has been regarded as irrelevant as it does not relate to methodology or guidance provided by the CDNA, NNDSS or AHPPC for the relevant terms within your request.

As I have decided that some of the information in the documents released to you is exempt from disclosure, I have prepared an edited copy of the document(s) by deleting the exempt information from the documents under section 22 of the FOI Act as outlined above.

3. Section 47E - Documents affecting certain operations of agencies

Section 47E of the FOI Act provides that a document is conditionally exempt if its disclosure would, or could reasonably be expected to, do any of the following:

- (a) prejudice the effectiveness of procedures or methods for the conduct of tests, examinations or audits by an agency;
- (b) prejudice the attainment of the objects of particular tests, examinations or audits conducted or to be conducted by an agency;

- (c) have a substantial adverse effect on the management or assessment of personnel by the Commonwealth or by an agency;
- (d) have a substantial adverse effect on the proper and efficient conduct of the operations of an agency.

Paragraph 6.84 of the FOI Guidelines states that section 47E conditionally exempts a document where disclosure would, or could reasonably be expected to, prejudice or have a substantial adverse effect on certain identified agency operations.

Paragraph 6.103 of the FOI Guidelines states that for this conditional exemption to apply, the documents must relate to either:

the management of personnel - including the broader human resources policies and activities, recruitment, promotion, compensation, discipline, harassment and occupational health and safety, or

the assessment of personnel - including the broader performance management policies and activities concerning competency, in-house training requirements, appraisals and underperformance, counselling, feedback, assessment for bonus or eligibility for progression.

The department has statutory obligations under the *Work Health and Safety Act 2011*, including a primary duty of care, so far as is reasonably practicable, to ensure that persons are not put at risk from work carried out as part of the conduct of the department. It is the aim of the department's Work Health and Safety framework to protect workers and other persons against harm to their health, safety and welfare through elimination or minimisation of risks arising from work, and release of such information could cause harm to their physical and mental wellbeing.

I am satisfied that disclosure of the personal information of public servants contained in the documents relevant to your request may be substantially and adversely affect the department's ability to meet its statutory obligations under the WHS Act. There is therefore a protective element to my decision to ensure that departmental staff are not subjected to inappropriate risks or harm.

I am satisfied that, because of the nature of the work performed by the public servants whose names and contact details are included in the documents, disclosure of that information may pose a risk to the health and safety of those staff.

The response to the COVID-19 pandemic is a divisive issue within some elements of the community, both within Australia and globally. There has been protest activity outside the department's buildings in Canberra on several occasions which has required police attendance. In addition, Australian members of parliament have been targets of violence and threats in this regard. The Victorian Department of Parliamentary Services referenced in its 2020-21 annual report, that Ministers of Parliament and their staff had been "frequently targeted by protest activity", and security incidents were growing significantly. For the 2020-21 year in the state of Victoria, Parliamentary security responded to 112 incidents at ministerial offices, up 124 per cent on the previous year. Furthermore, both the Premier of Western Australia and the former Chief Minister of the Northern Territory have been subjected to threats of violence, both to themselves personally and to their families. In the case of the

threats to the Premier of Western Australia, these resulted in two members of the community being charged with criminal offences.

The COVID-19 pandemic has seen an increase in single issue and grievance fuelled harassment, animosity and in some instances, violence, towards those who are actively involved in the government's response to it. As such, there is a protective element to my decision.

The department provides support and information to the Australian community and has many external facing contact points including phone and email addresses for the community to contact the department in a safe and efficient way. These general contact details are readily available, including being published on the department's website.

These specific channels of communication have been put in place to enable the department to effectively manage its resources and protect the wellbeing of its staff. They are resourced to manage enquiries from members of the public, with staff appropriately trained to manage these types of enquiries. It is reasonable to expect that if these channels of communication were by-passed, the department would experience a diversion of its resources, and in addition the management functions of the agency and its personnel would be detrimentally impacted.

I am satisfied that the parts of the documents marked 's47E(c)' relate to workplace health and safety functions.

I am satisfied that the parts of the documents marked 's47E(c)' would, or could reasonably be expected to have, a substantial adverse effect on the management or assessment of personnel by the department.

Paragraph 6.84 of the FOI Guidelines states that section 47E conditionally exempts a document where disclosure would, or could reasonably be expected to, prejudice or have a substantial adverse effect on certain identified agency operations.

Examples provided in paragraph 6.113 of the FOI Guidelines indicate that use of 47E(d) may be appropriate where disclosure of the information would:

- result in the need to make substantial changes to procedures to avoid jeopardising the effectiveness or methods and procedures used by the agency, and/or
- prejudice of the ability of an agency to perform its statutory, regulatory or public safety functions.

Paragraph 6.112 of the FOI Guidelines states that an agency's operations may not be substantially adversely affected if the disclosure would, or could reasonably be expected to, lead to a change in the agency's processes that would enable those processes to be more efficient.

Paragraph 6.115 of the FOI Guidelines state that the predicted effect of disclosure must bear on the department's 'proper and efficient' operations, that is, the department is undertaking its expected activities in an expected manner. Where disclosure of the

documents reveals unlawful activities or inefficiencies, this element of the conditional exemption will not be met and the conditional exemption will not apply.

You have requested access to documents that contain information about the Communicable Diseases Network Australia.

I am satisfied that the parts of the documents marked 's47E(d)' contain information which, if disclosed, would or could reasonably be expected to, have a substantial and an unreasonable effect on the department's proper and efficient operations.

You have requested access to documents that contain non-public facing email addresses used by the department.

I am satisfied that the parts of the documents marked 's47E(d)' contain information which, if disclosed, would or could reasonably be expected to, have a substantial and an unreasonable effect on the department's proper and efficient operations, namely, its management of its communications channels.

If the email addresses in question were to be released, it could reasonably be expected to result in an influx of unsolicited emails to mailboxes used for internal administrative processes. If this occurred, the department would need to change the addresses of or decommission those inboxes, at operational and financial loss to the department. I am therefore satisfied that any impediment to the efficient and effective administration of departmental emails and communication channels would have a substantial adverse effect on the proper and efficient conduct of the department.

In forming this decision, I note that the use of non-public facing operational email addresses to manage administrative functions are operational activities that are being undertaken in an expected and lawful manner. I am further satisfied that release of these addresses would not reveal inefficiencies in the way in which the department conducts those operational activities.

For the reasons outlined above, I have decided that the parts of the documents marked 's47E' are conditionally exempt from disclosure under section 47E of the FOI Act.

Where a document is found to be conditionally exempt, the department must give access to that document unless access to the document at this time would, on balance, be contrary to the public interest. I have addressed the public interest considerations below.

4. Section 47F - Documents affecting personal privacy

Section 47F of the FOI Act provides that a document is conditionally exempt if its disclosure would involve the unreasonable disclosure of personal information about any person (including a deceased person).

Personal Information

Personal information has the same meaning as in the Privacy Act. Specifically, section 6 of the Privacy Act provides that *personal information* means information or an opinion about an identified individual, or an individual who is reasonably identifiable whether

the information or opinion is true or not; and whether the information or opinion is recorded in a material form or not.

Paragraph 6.125 of the FOI Guidelines states that personal information can include a person's name, address, telephone number, date of birth, medical records, bank account details, taxation information and signature.

Paragraph 6.132 of the FOI Guidelines states that an individual is a natural person and does not include a corporation, trust, body politic or incorporated association. Section 47F specifically extends to the personal information of deceased persons.

I am satisfied that parts of the documents marked 's47F' includes personal information.

Unreasonable Disclosure of Personal Information

Subsection 47F(2) of the FOI Act provides that in determining whether the disclosure would involve the unreasonable disclosure of personal information, I must have regard to the following matters:

- (a) the extent to which the information is well known
- (b) whether the person to whom the information relates is known to be (or to have been) associated with the matters dealt with in the document
- (c) the availability of the information from publicly accessible sources
- (d) any other matters that the agency or Minister considers relevant.

Paragraph 6.133 of the FOI Guidelines states that:

The personal privacy exemption is designed to prevent the unreasonable invasion of third parties' privacy. The test of 'unreasonableness' implies a need to balance the public interest in disclosure of government-held information and the private interest in the privacy of individuals. The test does not, however, amount to the public interest test of s 11A(5), which follows later in the decision making process. It is possible that the decision maker may need to consider one or more factors twice, once to determine if a projected effect is unreasonable and again when assessing the public interest balance.

I note that the AAT, in *Re Chandra and Minister for Immigration and Ethnic Affairs [1984] AATA 437* at paragraph 51-52, stated that:

... whether a disclosure is 'unreasonable' requires ... a consideration of all the circumstances, including the nature of the information that would be disclosed, the circumstances in which the information was obtained, the likelihood of the information being information that the person concerned would not wish to have disclosed without consent, and whether the information has any current relevance ... it is also necessary in my view to take into consideration the public interest recognised by the Act in the disclosure of information ... and to weigh that interest in the balance against the public interest in protecting the personal privacy of a third party ...

Paragraphs 6.137 and 6.138 of the FOI Guidelines state:

- 6.137 Key factors for determining whether disclosure is unreasonable include:
- the author of the document is identifiable

- the documents contain third party personal information
- release of the documents would cause stress on the third party
- no public purpose would be achieved through release

6.138 As discussed in the leading s 47F IC review decision of 'FG' and National Archives of Australia [2015] AICmr 26, other factors considered to be relevant include:

- the nature, age and current relevance of the information
- any detriment that disclosure may cause to the person to whom the information relates
- any opposition to disclosure expressed or likely to be held by that person
- the circumstances of an agency's collection and use of the information
- the fact that the FOI Act does not control or restrict any subsequent use or dissemination of information released under the FOI Act
- any submission an FOI applicant chooses to make in support of their application as to their reasons for seeking access and their intended or likely use or dissemination of the information, and
- whether disclosure of the information might advance the public interest in government transparency and integrity

The documents contain the personal information of Australian Public Service (APS) staff who are not in the Senior Executive Service (SES).

Paragraph 6.152 of the FOI Guidelines states:

When considering whether it would be unreasonable to disclose the names of public servants, there is no basis under the FOI Act for agencies to start from the position that the classification level of a departmental officer determines whether their name would be unreasonable to disclose. In seeking to claim the exemption, an agency needs to consider the factors identified above at [6.135] – [6.138] in the context of the document, rather than start from the assumption that such information is exempt. However, I note that in *Chief Executive Officer, Services Australia and Justin Warren* [2020] AATA 4557 (*Warren*), at paragraph 83, Deputy President S A Forgie noted:

The whole of the FOI Act is a finely tuned balance between two interests. In one side of the balance is the facilitation and promotion of access to a national resource that is information held by Government, which enables increased public participation in Government processes and increased scrutiny, discussion, comment, and review of the Government's activities. In the other is the protection of the national interest, the essential operation of government and the privacy of those who deal with government. It is most important, therefore, that its provisions be read very carefully and that presumptions should not be introduced that are not expressed, or necessarily implicit, in the words Parliament has chosen to achieve the balance that it wants. Those words should be the starting point of any consideration rather than any presumption that agencies and ministers should start from the position that the inclusion of the full names of staff in documents increases transparency and increases the objects of the FOI Act.

The response to the COVID-19 pandemic is a divisive issue within some elements of the community, both within Australia and globally. There has been protest activity outside the department's buildings in Canberra on several occasions which has

required police attendance. In addition, Australian members of parliament have been targets of violence and threats in this regard. The Victorian Department of Parliamentary Services referenced in its 2020-21 annual report, that Ministers of Parliament and their staff had been “frequently targeted by protest activity”, and security incidents were growing significantly. For the 2020-21 year in the state of Victoria, Parliamentary security responded to 112 incidents at ministerial offices, up 124 per cent on the previous year. Furthermore, both the Premier of Western Australia and the former Chief Minister of the Northern Territory have been subjected to threats of violence, both to themselves personally and to their families. In the case of the threats to the Premier of Western Australia, these resulted in two members of the community being charged with criminal offences.

The COVID-19 pandemic has seen an increase in single issue and grievance fuelled harassment, animosity and in some instances, violence, towards those who are actively involved in the government’s response to it. As such, there is a protective element to my decision.

I am satisfied that the disclosure of personal information contained within the documents would, in the circumstances, constitute an unreasonable disclosure of personal information for the following reasons:

- the individuals whose personal information is contained in the documents are identifiable
- release of this information would cause anxiety to the individuals concerned
- no further public purpose would be achieved through the release of the personal information, noting that the personal information is included in the document as a result of their employment circumstance
- the information is current and has not lost its sensitivity through the passage of time
- the placing of the personal information of individuals who work for a government department into the public domain has the potential to place those individuals at risk of harassment, abuse, threats and intimidation. This would be detrimental to the individuals concerned, and potentially also their families. Mitigating this risk is even more important with the prevalence of social media and technology allowing individuals to be more easily identifiable and contactable in online environments
- the individuals would not expect the information to be placed in the public domain, and detriment may be caused to the individuals to whom the information relates, and
- the FOI Act does not control or restrict any subsequent use or dissemination of information released under the FOI Act.

For the reasons outlined above, I have decided that the parts of the documents marked ‘s47F’ are conditionally exempt from disclosure under section 47F of the FOI Act.

Where a document is found to be conditionally exempt, the department must give access to that document unless access to the document at this time would, on balance, be contrary to the public interest. I have addressed the public interest considerations below.

5. Disclosure is not in the public interest

Pursuant to subsection 11A(5) of the FOI Act, the department must give access to conditionally exempt documents unless access to the documents at that time would, on balance, be contrary to the public interest. I have therefore considered whether disclosure of the documents would be contrary to the public interest.

Paragraph 6.224 of the FOI Guidelines states:

The public interest test is considered to be:

- something that is of serious concern or benefit to the public, not merely of individual interest
- not something of interest to the public, but in the interest of the public
- not a static concept, where it lies in a particular matter will often depend on a balancing of interests
- necessarily broad and non-specific and
- relates to matters of common concern or relevance to all members of the public, or a substantial section of the public.

Factors favouring disclosure

Section 11B of the FOI Act provides that factors favouring access to documents in the public interest include whether access to the documents would do any of the following:

- promote the objects of the FOI Act
- inform debate on a matter of public importance
- promote effective oversight of public expenditure, or
- allow a person to access his or her own personal information.

Having regard to the above, I consider that disclosure of the conditionally exempt information at this time:

- would provide access to documents held by an agency of the Commonwealth which would promote the objects of the FOI Act by providing the Australian community with access to information held by the Australian Government.
- would not inform debate on a matter of public importance
- would not promote effective oversight of public expenditure, and
- would not allow you access to your own personal information.

Factors weighing against disclosure

I consider that the following public interest factors weigh against disclosure of the conditionally exempt information at this time, on the basis that disclosure:

s47E(c)

In considering the public interest in disclosing the names and contact details of the departmental officers to you, I have taken into consideration the following factors that weigh against disclosure of the conditionally exempt information at this time:

- the type of work undertaken by the relevant officers
- the fact that the relevant officer's details are not publicly available, including in the Government Online Directory

Having regard to these factors, I consider that release of the information to you:

- could reasonably be expected to prejudice the fair treatment of individuals in relation to allegations of misconduct or unlawful, negligent or improper conduct. Any impediment to the ability of the department to manage its staff in relation to investigations and/or enquiries into allegations of misconduct or unlawful, negligent or improper conduct is contrary to the objects of the *Public Service Act 1999*, and is therefore contrary to the public interest.
- could reasonably be expected to prejudice the ability of the department to effectively manage its staff. Any impediment to the ability of the department to manage its staff to meet its operational requirements and regulatory obligations is contrary to the public interest.
- could reasonably be expected to adversely impact the ability of the department to attract, recruit and retain staff if a precedent of release of employment information was established. Any impediment to the ability of the department to meet its operational requirements and regulatory obligations is contrary to the public interest.

s47E(d)

- could reasonably be expected to impede the flow of information to the department as a regulatory agency. Any impediment to the ability of the department to undertake its regulatory functions is against the public interest.
- could reasonably be expected to divert correspondence towards the department's non-public-facing communication channels, which are not intended or resourced for this purpose. Any disruption to the department's communication channels could reasonably be expected to result in disruption to the operations of the agency, which is against the public interest.
- would not provide any additional benefit to the public, noting that the department already has existing public communications channels that are, in my view, readily available and sufficient for this purpose.

s47F

- could reasonably be expected to prejudice the protection of the relevant individuals' right to personal privacy, noting that the substance of the documents has been released to you and disclosure of the personal information would not provide you with any further insight into the workings of government.
- would not achieve any public purpose and, on balance, would harm the individuals' right to personal privacy, which would be contrary to the objects of the *Privacy Act 1988* and therefore against the public interest.
- would prejudice the department's ability to meet its statutory obligations and responsibilities in relation to the work health and safety of its employees. Any impediment to the ability of the department to manage the health and safety of its staff would be contrary to the objects of the *Work Health and Safety Act 2011 (Cth)*, and therefore contrary to the public interest.
- could reasonably be expected to adversely impact the ability of the department to attract, recruit and retain staff. Any impediment to the ability of the department to meet its operational requirements is contrary to the public interest.

In forming my decision, I confirm that I have not taken into account any of the irrelevant factors set out in subsection 11B(4) of the FOI Act, which are:

- (a) access to the document could result in embarrassment to the Commonwealth Government, or cause a loss of confidence in the Commonwealth Government;
- (b) access to the document could result in any person misinterpreting or misunderstanding the document;
- (c) the author of the document was (or is) of high seniority in the agency to which the request for access to the document was made;
- (d) access to the document could result in confusion or unnecessary debate.

Conclusion

For the reasons set out above, after weighing all public interest factors for and against disclosure, I have decided that, on balance, disclosure of the conditionally exemption information would be contrary to the public interest. I am satisfied that the benefit to the public resulting from disclosure is outweighed by the benefit to the public of withholding the information. I have therefore redacted the conditionally exempt information from the documents released to you.

ATTACHMENT C.

YOUR REVIEW RIGHTS

If you are dissatisfied with my decision, you may apply for a review.

Internal review

You can request internal review within 30 days of you receiving this decision. An internal review will be conducted by a different officer from the original decision maker.

No particular form is required to apply for review although it will assist your case to set out the grounds on which you believe that the original decision should be changed.

Applications for internal review can be made by:

Email: FOI@health.gov.au

Mail: FOI Unit (MDP 516)
Department of Health and Aged Care
GPO Box 9848
CANBERRA ACT 2601

If you choose to seek an internal review, you will also have a right to apply for Information Commissioner review (IC review) of the internal review decision once it has been provided to you.

Information Commissioner review or complaint

You have the right to seek Information Commissioner (IC) review of this decision. For FOI applicants, an application for IC review must be made in writing within 60 days of the decision. For third parties who object to disclosure of their information, an application for IC review must be made in writing within 30 days of the decision.

If you are not satisfied with the way we have handled your FOI request, you can lodge a complaint with the OAIC. However, the OAIC suggests that complaints are made to the agency in the first instance.

While there is no particular form required to make a complaint to the OAIC, the complaint should be in writing and set out the reasons for why you are dissatisfied with the way your request was processed. It should also identify the Department of Health and Aged Care as the agency about which you are complaining.

You can make an IC review application or make an FOI complaint in one of the following ways:

- online at www.oaic.gov.au/freedom-of-information/reviews-and-complaints/
- via email to foidr@oaic.gov.au
- by mail to GPO Box 5218 Sydney NSW 2001, or
- by fax to 02 9284 9666.

More information about the Information Commissioner reviews and complaints is available on the OAIC website here: www.oaic.gov.au/freedom-of-information/foi-review-process.

Complaint

If you are dissatisfied with action taken by the department, you may also make a complaint directly to the department.

Complaints to the department are covered by the department's privacy policy. A form for lodging a complaint directly to the department is available on the department's website here: www.health.gov.au/about-us/contact-us/complaints