

24 September 2014

Anonymous

Dear Applicant

Request for access to documents under the *Freedom of Information Act 1982 (Cth)*

I refer to your correspondence dated 27 June 2014, received by Defence Housing Australia (DHA) on 27 June 2014, in which you requested access under the *Freedom of Information Act 1982 (Cth)* (the **FOI Act**) to the following documents:

Please note we are not seeking information on specific individuals, or any identifying information that might be protected under the Privacy Act 1988. This request relates to the employment process by DHA for the roles of 'Relationship Manager' and 'Senior Relationship Manager', and not to specific individuals.

- 1. Qualifications, industry experience and skills for each role, whether by informal or internal position brief or external job advertisement.*
- 2. Number of current DHA employees who were considered for the roles under the new staffing structure realignment, as per the MD's Message from November 2013.*
- 3. Number of current DHA Contracted Sales Consultants who were considered for the roles.*
- 4. The Managing Director's approval, as per the MD's Message, authorising the external appointments made in these roles.*
- 5. Details of the advertisement and recruitment process followed for these roles, including any advertisements on the DHA website, the APS website, other online or print media, including the date of advertisement and duration of placement.*
- 6. Details of any disclosure made by the National Sales Manager regarding any prior or existing relationship with the candidates appointed to these roles.*
- 7. Any directives, meeting minutes, policies or guidance provided by or to; the DHA MD, COO, General Manager Portfolio Operations, Head of Sales and Portfolio Management or National Sales Manager, with regard to:*
 - i. development or recruitment of these roles within DHA;*
 - ii. the suitability of the current DHA Contracted Sales Consultants for these roles;*

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- iii. *the ongoing nature of the DHA Contracted Sales Consultants roles in relation to the SLB business and these new roles;*
- iv. *the potential impact to the SLB Sales Target of the shift from external Consultants to these roles;*
- v. *plans to remove management of existing lessor from the current Contracted Sales Consultants to these new roles;*
- vi. *the priority, rules or guidelines pertaining to the distribution of new leads between external Contracted Sales Consultants and internal sales resources, including these new rules;*
- vii. *plans for the roles of the Contracted Sales Consultants within DHA's SLB programme for this and upcoming years.*

Decision maker

I am an authorised decision-maker under section 23 of the FOI Act.

Decision

DHA has identified 45 documents as falling within the scope of your FOI request. A schedule of the documents is set out at **Attachment A (the Schedule)**.

I hereby decide that:

- (a) documents 24, 25, 27, 28, 30, 33, 34 and 35 are partially and conditionally exempt under section 47E of the FOI Act and disclosure would be contrary to the public interest. Those parts of those documents that are not conditionally exempt are to be released;
- (b) documents 4, 5, 6, 7, 8, 10, 11, 12, 13, 14, 16, 17, 18, 19, 20, 21, 22, 23, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 44 and 45 are partially and conditionally exempt under section 47F of the FOI Act and disclosure would be contrary to the public interest. Those parts of those documents that are not conditionally exempt are to be released;
- (c) document 24 is partially and conditionally exempt under section 47G of the FOI Act and disclosure would be contrary to the public interest. Those parts of the document that are not conditionally exempt are to be released; and
- (d) documents 1, 2, 3, 9, 15 and 43 are to be released in full.

Material on which my findings of fact are based

I based my findings of fact on the following material:

- (a) the content of the documents to which you sought access;
- (b) the relevant provisions of the FOI Act;
- (c) the Freedom of Information Guidelines published by the Office of the Australian Information Commissioner under section 93A of the FOI Act (**the OAIC Guidelines**);

- (d) responses to third party consultation undertaken by DHA under section 27A of the FOI Act.

Reasons

Where the Schedule indicates an exemption claim has been applied to a document or part of a document, my findings of fact and reasons for deciding that the exemption provision applies to that document or part of the document are set out below.

Section 47E – Certain operations of agencies

Subsection 47E(c) of the FOI Act provides:

A document is conditionally exempt if its disclosure under this Act would, or could reasonably be expected to, do any of the following:

...

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

In relation to subsection 47E(c), the OAIC Guidelines set out that where the document relates to the agency's policies and practices relating to the assessment and management of personnel, the decision maker must address both elements of the conditional exemption in subsection 47E(c), namely, that:

- (a) an effect would reasonably be expected following disclosure; and
- (b) the expected effect would be both substantial and adverse.

For this exemption to apply, the documents must relate to either:

- (a) the management of personnel – including the broader human resources policies and activities, recruitment, promotion, compensation, discipline, harassment and occupational health and safety; or
- (b) 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.

Document 24 is an interim report detailing the findings and opportunities from a review undertaken of the Sale and Leaseback (SLB) Program within DHA. The SLB Program review was undertaken at the request of the Chief Operating Officer of DHA. The report contains largely factual material concerning the SLB Program, however, the report also contains the following material:

- (a) the structure of the DHA Sales team and the performance and salary package information of employees and consultants within the DHA Sales team;
- (b) the impact of performance on salary packages within the DHA Sales team and consideration of whether the salary packages need to be amended as a result of performance;

- (c) the management of referral risk within the DHA Sales team, including ways in which to minimise or eliminate the referral risk by possible restructures of the DHA Sales team based on poor performance of some DHA Sales team employees and consultants; and
- (d) the breakdown of DHA selling expenses, including amounts allocated for salary packages.

The information contained in document 24 relates to both the management and assessment of DHA personnel. In particular, the information relates to the performance management of the DHA Sales team and the impact of the performance of that team on consultants and employees' salary packages and eligibility for progression. The salary information contained in document 24 is also linked to the performance of the employees and consultants within the DHA Sales team. The release of the information would have a substantial and adverse effect on the management and assessment of personnel in that the information is not publicly available and would give employees and consultants access to the performance and salary package information of other employees and consultants. This may cause disruption to the DHA sales team and the performance of employees within the DHA Sales team, and across the broader DHA, as they compare their performance and salary package with that of other employees and consultants.

Documents 25, 28 and 35 are internal DHA documents that discuss the structure of the DHA Sales team and the performance and salary packages of employees and consultants within that team. The documents also discuss possible restructures of the DHA Sales team as a result of poor performance of some DHA Sales team employees and consultants. The release of the information contained in these documents would have a substantial and adverse effect on the management and assessment of personnel as it would enable DHA employees to identify the basis on which members of the Sales team were not retained or promoted and would allow them access to the performance and salary package information of other DHA employees and consultants. Further, the restructure information contained in the documents is not necessarily final which may cause unnecessary concern for identified DHA employees and consultants if released. DHA could not properly manage its personnel if DHA employees and consultants had access to the performance and salary package information of other employees and consultants.

Documents 27, 30 and 34 set out the salary package information of the DHA Sales team and the proposed salary packages for each position within the DHA Sales team. Release of this information would have a substantial and adverse effect on the management and assessment of DHA personnel as employees and consultants would have access to the salary packages of their colleagues which would potentially cause disruption to the performance of those personnel as they compare their salary package with that of other employees and consultants.

Document 33 details the issues and performance problems within the DHA Sales team and the impact of those issues and performance problems on the operation of the DHA Sales team. The document sets out proposed strategies to minimise or eliminate the identified issues and performance problems. Release of this information would have a substantial and adverse effect on the management and assessment of DHA personnel as DHA employees and consultants would have access to the methods in which DHA plans to manage any human resources issue that may arise, therefore reducing the effectiveness of those methods.

In summary, release of the performance management and salary package information contained in the documents will have a substantial and adverse effect on the management and assessment of DHA personnel by DHA. The information primarily relates to the DHA Sales team which is a very small team. Release of the performance management and salary

package information will affect the morale and relationships of that team and DHA's ability to manage its employees. This may then make it difficult for DHA to recruit and retain employees.

The fact that release of the material in the above documents would have a substantial and adverse effect on the management and assessment of DHA personnel is further supported by the fact that information released under FOI is not subject to any confidentiality conditions. Disclosure of information under FOI is effectively disclosure to the world at large.

Under subsection 11A(5) of the FOI Act, an agency is required to give the FOI applicant access to the document if it is conditionally exempt at a particular time unless (in the circumstances) access to the document at that time would, on balance, be contrary to the public interest. Factors that favour access are set out in section 11B(3) of the FOI Act. A further non-exhaustive list of factors that favour access are listed in the OAIC Guidelines at paragraph 6.25.

I consider that the factors favouring access in this case are as follows:

- the extent to which disclosure would promote the objects of the FOI Act; and
- release of the documents would increase scrutiny and review of government activities, and facilitate public access to information generally.

However, I consider that these factors are outweighed by the following factors against release:

- release of the salary package information presents a risk to the efficient operation of the DHA human resources team as DHA cannot properly manage its personnel if DHA employees and consultants have access to the salary package information of others;
- DHA is a competitor with other private sector property management businesses and has a need to attract and retain good staff and maintain a stable sales team. If the information was released and was obtained by DHA's competitors, that would have an impact on DHA's operations;
- release of the performance management information contained in the documents would reveal the processes undertaken by DHA in the management and assessment of personnel which, if released, would reduce the effectiveness of those processes; and
- potential impact on privacy within DHA because the team is small, members of the team may be able to identify or infer the possible identities of individuals mentioned in the documents.

Following consideration of these factors, I have decided that in the circumstances of this particular matter, the public interest in disclosing the salary package and performance management information contained in documents 24, 25, 27, 28, 30, 33, 34 and 35 is outweighed by the public interest against disclosure. This is primarily because, on balance, very limited public purpose would be achieved through the release of this information.

I am satisfied that the material contained in documents 24, 25, 27, 28, 30, 33, 34 and 35 is conditionally exempt under subsection 47E(c) of the FOI Act. In the alternative, and for the same reasons discussed above, I am satisfied that the information contained in the

documents would be conditionally exempt under subsection 47E(d) of the FOI Act as well. Furthermore, I have decided that on balance it would be contrary to the public interest to release the material. Accordingly, I have decided to release those documents with the material redacted.

Section 47F – Public interest conditional exemption - Personal Privacy

Section 47F of the FOI Act relevantly provides:

- (1) *A document is conditionally exempt if its disclosure under this Act would involve the unreasonable disclosure of personal information about any person (including a deceased person).*
- (2) *In determining whether the disclosure of the document would involve the unreasonable disclosure of personal information, an agency or Minister 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.*

'Personal information' is defined in section 4 of the FOI Act as:

Information or an opinion (including information forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

Documents 4, 5, 6, 7, 8, 10, 11, 12, 13, 14, 16, 17, 18, 19, 20, 21, 22, 23, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 44 and 45 contain the personal information of a number of different DHA employees.

Documents 4, 5 and 11 contain the names, employment status and relevant work experience details of a number of DHA employees. Documents 4, 5 and 11 also set out a business case for the hiring of staff now employed by DHA. The documents set out the basis for hiring the staff and the details of the relevant employment arrangements of those staff.

Document 11 also contains salary package information for a DHA employee. Disclosure of the personal information contained in the documents would enable the identity of the individuals concerned to be reasonably ascertained. Further, the information is not publicly available and the disclosure of the personal information may cause stress to the DHA employees if released to other DHA employees.

Documents 4, 5, 6, 11, 12, 17, 23, 25, 26, 27, 29, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 44 and 45 contain the mobile phone numbers of DHA employees. The DHA employees use the mobile phones for both business and personal use. Further, release of the mobile phone numbers would enable people to contact the DHA employees outside of work hours. Release of the mobile phone numbers would therefore constitute an unreasonable disclosure of personal information on that basis.

Documents 6, 12 and 23 contain the names and salary package information of DHA employees and consultants. These documents set out the difference in the salary packages of different DHA employees and consultants. Disclosure of the personal information contained in the documents would enable the identity of the individuals concerned to be reasonably ascertained. Further, the information is not publicly available and disclosure of the personal information would cause stress to the DHA employees and consultants if released to other DHA employees and consultants, particularly if DHA employees at the same or similar levels are receiving different salary packages.

Documents 7, 20 and 21 contain the personal information of individuals being considered for positions within DHA. Document 8 contains the proposed salary for one of those individuals. Document 10 is a remuneration form for one of the individuals once they obtained the position at DHA. The remuneration form contains the employment arrangements and details for that employee, details of the employee's salary package and other personal information relating to the employee such as home address and contact information. Disclosure of the personal information contained in the documents would enable the identity of the individuals concerned to be reasonably ascertained. Further, the information is not publicly available and would cause stress to the individuals concerned if released, particularly to other DHA employees.

Documents 10, 13, 14, 16, 18, 19 contain the signatures of DHA employees. Release of the signatures of DHA employees would expose the DHA employees to the risk of forgery. Release of the signatures would therefore constitute an unreasonable disclosure of personal information on that basis.

Document 17 contains the personal information of a person formally employed by DHA. The individual is no longer employed by DHA and is not known to be associated with the information contained in the document. Further, the information is not publicly available.

Document 22 contains the particular performance ratings assigned to external sales consultants throughout the performance review process. The ratings relate to external sales consultants of which there are only 10. It would therefore be possible to identify which performance ratings applied to which sale consultant and would therefore reveal the performance ratings for each sale consultant. This information is not publicly available and may cause stress to the individuals concerned if released, particularly to other DHA employees.

Documents 25 and 34 contain the personal information of DHA employees and consultants that were undergoing performance management. The documents contain comments in relation to the performance of these employees and recommended ways in which to deal with any underperformance. The documents also contain the salary package information of employees and contractors. The information is not publicly available and release of the information may cause stress to the individuals concerned if released, particularly to other DHA employees.

Documents 28 and 30 contain the salary package information for the DHA Sales Team. The salary package information for each employee and consultant within the DHA Sales team is listed in alphabetical order and relate specifically to members of the DHA Sales Team, of which there are only 15. Document 30 also contains the total number of people within each party of the DHA Sales team and the total income received by each part of the DHA Sales team. It would therefore be possible to identify which salary package applies to which member of the DHA Sales team and would indicate the level of performance for each member of the DHA Sales team. The information is not publicly available and may cause stress to the individuals concerned if released, particularly to other DHA employees.

Document 29, 32, 42 and 45 contain the personal information of DHA employees in that they set out the basis for a possible promotion and other reshuffling of employees to achieve maximum efficiency within the DHA Sales team. The documents contain the work experience of DHA employees and the physical location of those employees. The information is not publicly available and may cause stress to the individuals concerned if released.

Document 38 contains the names of DHA investors. The document also indicates the number of DHA properties that each investor has. The investors are not DHA employees and it is not publicly known that they are DHA investors. Release of the information may cause stress or harm to the DHA investors and it is on that basis that release of the information would be unreasonable.

I find that the release of this information would constitute an unreasonable disclosure of personal information for the following reasons:

- (a) information released under FOI is not subject to any confidentiality conditions and the personal information contained in the documents, once released under FOI, may be used against the particular individuals who are identified in the documents;
- (b) the personal information contained in the documents is not publicly known or available; and
- (c) disclosure would not shed light on the workings of government.

Under subsection 11A(5), the FOI Act requires that the agency or minister give the FOI applicant access to the document if it is conditionally exempt at a particular time unless (in the circumstances) access to the document at that time would, on balance, be contrary to the public interest.

To determine if the disclosure would be contrary to the public interest, I have weighed up the public interest for and against disclosure under subsection 11A(5) of the FOI Act, and have taken into account:

- (a) the extent to which disclosure would promote the objectives of the FOI Act;
- (b) the extent to which disclosure would assist in informing debate on a matter of public importance; and
- (c) the extent to which disclosure would prejudice the protection of an individual's right to privacy.

In relation to the first and second of these matters, I find that the personal information contained in the documents would not assist in informing debate on a matter of public importance or promote the objects of the FOI Act. The personal information contained in the documents is limited to the identities of DHA employees and consultants and the performance and salary package information of those employees as well as the personal information of DHA investors.

Disclosing the personal information contained in the documents is likely to cause harm or stress to the individuals concerned. As disclosure under an FOI process is effectively disclosure to the world at large, release of the personal information contained in the documents would give rise to an unacceptable risk of harassment or harm if it were to come

into the hands of other DHA employees who may have been performance managed differently or may be receiving a different salary package. Further, release of the information may potentially damage the professional reputations of the DHA employees and consultants. Release of the personal information of DHA investors may also put those investors at risk of harm.

Following consideration of these factors, I have decided that in the circumstances of this particular matter, the public interest in disclosing the personal information in documents 4, 5, 6, 7, 8, 10, 11, 12, 13, 14, 16, 17, 18, 19, 20, 21, 22, 23, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 44 and 45 is outweighed by the public interest against disclosure. This is primarily because, on balance, very limited public purpose would be achieved through the release of this information, and the release of the information would cause harm or stress to the individuals concerned. In the circumstances, I consider that the protection of privacy is a factor that outweighs any factors in favour of disclosure.

I am satisfied that the personal information in documents 4, 5, 6, 7, 8, 10, 11, 12, 13, 14, 16, 17, 18, 19, 20, 21, 22, 23, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 44 and 45 is conditionally exempt under section 47F of the FOI Act. Furthermore, I have decided that on balance it would be contrary to the public interest to release the personal information. Accordingly, I have decided to release the documents with the personal information redacted.

Section 47G – Business information

Section 47G of the FOI Act provides:

- (1) *A document is conditionally exempt if its disclosure under this Act would disclose information concerning a person in respect of his or her business or professional affairs or concerning the business, commercial or financial affairs of an organisation or undertaking, in a case in which the disclosure of the information:*
 - (a) *would, or could reasonably be expected to, unreasonably affect that person adversely in respect of his or her lawful business or professional affairs or that organisation or undertaking in respect of its lawful business, commercial or financial affairs; or*
 - (b) *could reasonably be expected to prejudice the future supply of information to the Commonwealth, Norfolk Island or an agency for the purpose of the administration of a law of the Commonwealth or of a Territory or the administration of matters administered by the agency.*

A document will be conditionally exempt under section 47G of the FOI Act if its disclosure will disclose information concerning the business, commercial or financial affairs of an organisation and that disclosure would, or could reasonably be expected to, unreasonably affect that organisation adversely in respect of its lawful business, commercial or financial affairs.

Under subsection 11A(5), the FOI Act requires that the agency or minister to give the FOI applicant access to the document if it is conditionally exempt at a particular time unless (in the circumstances) access to the document at that time would, on balance, be contrary to the public interest.

Document 24 is an interim report detailing the findings and opportunities from a review undertaken of the SLB Program within DHA. The SLB Program review was undertaken at the request of the Chief Operating Officer of DHA. The report contains largely factual material concerning the SLB Program, however, the report also contains the following material:

- (a) the relevant considerations for DHA when selecting a property for the SLB Program in order to improve the levels of profitable stock;
- (b) the timeframes for the valuation process and the factors that are influencing the valuation process and potentially delaying that process;
- (c) the timeframes for the listing of properties process and the factors that are influencing the listing process and potentially delaying that process and recommended ways to increase the efficiency of the listing process;
- (d) the management of referral risk within the DHA Sales team, including ways in which to minimise or eliminate the referral risk with possible restructures of the DHA Sales team as a result of poor performance of some DHA Sales team employees;
- (e) risks of the SLB Program that may give a competitive edge to businesses that compete with the DHA product;
- (f) ways to amend the DHA ballot process to reduce investor dissatisfaction; and
- (g) the breakdown of DHA selling expenses, which includes amounts allocated for salary packages.

Document 24 considers the implementation of a number of different strategies for improving the efficiency of the SLB Program and the impact of implementing those strategies on the DHA Sales team. The document also details a number of different risks and weaknesses of the SLB Program and the amounts that DHA spends on various different parts of the SLB Program. This information is not publicly known, and its disclosure would reveal DHA's strategic thinking on its business development in relation to the SLB Program. Further, there is a real risk that disclosure would give DHA's competitors a competitive advantage over DHA. Disclosure of the details in the document could arm a party whose interests are adverse to DHA's with information that could be used to harm DHA.

I therefore find that the release of the material contained in the document would, or could reasonably be expected to, unreasonably affect DHA in respect of its lawful business, commercial or financial affairs.

To determine if the disclosure would be contrary to the public interest, I have weighed up the public interest for and against disclosure under subsection 11A(5) of the FOI Act, and have taken into account the extent to which disclosure:

- would promote the objectives of the FOI Act;
- would assist in informing debate on a matter of public importance; and
- would harm the interests of DHA.

The information contained in the document may add to the information that is in the public domain concerning the SLB Program at DHA and in doing so would promote the objectives of the FOI Act. However, the public interest in releasing further details of the SLB Program

necessarily needs to be balanced against the potential commercial harm to the business affairs of DHA from that information being made public.

Following consideration of these factors, I have decided that in the circumstances of this particular matter, the public interest in disclosing the business information in the abovementioned document is outweighed by the public interest against disclosure. This is primarily because, on balance, very limited public purpose would be achieved through the release of this information, and the release of the information would harm the business affairs of DHA.

I am satisfied that the business information in the abovementioned document is conditionally exempt under section 47G of the FOI Act. In the alternative, and for the same reasons discussed above, I am satisfied that the information contained in the document would be conditionally exempt under subsection 47E(d) of the FOI Act as well. Furthermore, I have decided that on balance it would be contrary to the public interest to release the information. Accordingly, I have decided not to release the document to you.

Section 22 – Deletion of exempt or irrelevant material

Section 22 of the FOI Act provides that if an agency decides that granting access to a document would disclose information that would be exempt or reasonably be regarded as irrelevant to the request, then, where it is reasonably practicable to provide a copy with deletions, such a copy should be provided.

For the reasons discussed above, I have found that the following documents contain some material which is exempt under the FOI Act:

- (a) documents 24, 25, 27, 28, 30, 33, 34 and 35 are partially and conditionally exempt under section 47E of the FOI Act and disclosure would be contrary to the public interest. Those parts of those documents that are not conditionally exempt are to be released;
- (b) documents 4, 5, 6, 7, 8, 10, 11, 12, 13, 14, 16, 17, 18, 19, 20, 21, 22, 23, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 44 and 45 are partially and conditionally exempt under section 47F of the FOI Act and disclosure would be contrary to the public interest. Those parts of those documents that are not conditionally exempt are to be released;
- (c) document 24 is partially and conditionally exempt under section 47G of the FOI Act and disclosure would be contrary to the public interest. Those parts of the document that are not conditionally exempt are to be released.

I have decided to apply section 22 of the FOI Act to delete exempt material in respect of the documents at paragraph (b) above, in order to facilitate the release of the remainder of those documents to you, as set out in the Schedule at **Attachment A**.

Provision of documents

Documents that are not subject to any exemptions under the FOI Act are to be released in full. In circumstances where documents are subject to exemptions and it is practical for the exempt matter to be deleted, those documents will be released in part.

Charges

In response to DHA's preliminary assessment of charges letter and your email dated 20 August 2014, you have agreed to pay the charges as set out in paragraph 12. The charges for this request have been reviewed and I have included the reviewed assessment of charges below.

Search and retrieval time:	8	45	8 hours & 45 minutes @ \$15 per hour	\$ 131.25
Decision-making time:	24	5	24 hours & 5 minutes @ \$20 per hour	\$ 481.67
Copying of documents:	112		112 pages @ 10 cents per page	\$ 11.20
GST (Exempt):				Nil
Sub total:				\$ 624.12
Less			5 hours of free decision making time	\$ 100.00
			deposit	\$ 133.45
Total Outstanding				\$ 390.67

The revised outstanding amount is of \$390.67 should be made out to the Freedom of Information at Defence Housing Australia and forwarded to 26 Brisbane Avenue, Barton, ACT 2600. On receipt of the outstanding charges, the documents will be forwarded to you.

Appeal Rights

If you do not agree with my decision, you may apply for a review of the decision. I have attached an information sheet that explains your rights of review under the FOI Act (see **Attachment B**).

Yours sincerely


Pip Sackley
Executive Officer