

27 August 2012

Alex Harris
Email: requests@fyi.org.nz

Dear Mr Harris

OIA Request - Harris 30 July 2012
Our Ref: SOL115/2266

I refer to your email of 30 July 2012 requesting information under the Official Information Act 1982. You asked for information relating to the Law Commission's Review of the Official Information Act, specifically:

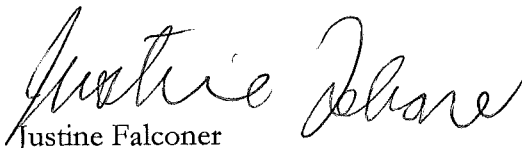
1. A copy of Crown Law's submissions;
2. All drafts, advice, and internal communications (including emails) relating to that submissions.

As requested, we provide a copy of our submission (attached) dated 27 January 2011 on the Law Commission's issues paper *The Public's Right to Know*. We also provide internal documents which contributed to that submission.

Internal legal advice on the potential implications of the proposals for Crown Law and the Law Officers is withheld on the grounds that it is necessary to maintain legal professional privilege under s 9(2)(h). References to specific advice which Crown Law has given departments on the Official Information Act 1982 are also withheld on those grounds. There are no considerations which render it desirable, in the public interest, to make that information available.

As this response constitutes a refusal, in part, I advise you of your right to seek a review of this decision by the Ombudsman under s 28 of the Official Information Act 1982.

Yours sincerely


Justine Falconer
Crown Counsel (Policy)

27 January 2011

John Burrows
Commissioner
Law Commission
P O Box 2590
WELLINGTON 6011

Dear Professor Burrows

Review of Official Information legislation
Our Ref: SOL115/2266

Thank you for your letter of 29 September 2010 inviting comment on the Law Commission's issues paper *The Public's Right to Know*. There are some aspects of the proposals on which we wish to comment, as set out below.

Scope of the Acts

1. We agree that it is desirable to clarify the status of information held by the Ministry of Justice in relation to courts. We also share the concerns expressed about any approach which attempts to separate judicial functions from administrative functions. This comes back to the fundamental question of the functions of the Ombudsmen and the focus of the OIA, as a check on executive function. Clearly identifying information maintained by the Executive concerning the general operation of the courts (eg. expenditure, buildings and resources) which is subject to the Act may be the preferable approach.

Decision making

2. We support the proposals for improved compilation and analysis of the case notes of the Ombudsmen. It will be important that the non-binding but persuasive nature of previous decisions and guidance publications is understood.

Protecting good government

3. The proposed redraft of the good government grounds is generally an improvement and may be able to be simplified further (particularly the very lengthy ground (iv)). We agree that the economy of expression of the UK approach is not desirable and may serve to increase debate about what might be withheld under such a provision.

Protecting privacy

4. We agree that the interface between the OIA and the Privacy Act is problematic. It is unclear that reference should be had to the privacy principles and privacy legislation when applying s 9(2)(a) of the OIA, or whether the OIA “trumps” the Privacy Act to the effect that only the public interest weighing test should be applied.
5. Where IPP 11 is most relevant will be in relation to requests for information that do not come from the person whose privacy is at issue. This means that, in relation to requests to departments and other agencies covered by the OIA, both the Privacy Act and the OIA are engaged where an OIA request covers “personal information”. For any other “agency” (as defined in the Privacy Act) only the Privacy Act is relevant.
6. We are not certain that it is correct to suggest as the report seems to at para 6.3¹ and elsewhere that IPP 11 does not apply to OIA requests.
7. Firmer guidance as suggested by option 1 would certainly be of assistance. The second option for reform introduces the need to consider two terms by requiring an assessment of whether disclosure of information would be “unreasonable” and then whether it may nonetheless be in the “public interest”.
8. Option three has the benefit of making it clear that PP 11 must be considered, which as we suggest above must be the case for any OIA request which covers personal information.
9. More broadly, the interface of the OIA with other legislation remains an issue, for example, the Privacy Act, Public Records Act, and Acts that have multiple clauses regulating use and release of information, such as the Climate Change Response Act. Section 52 of the OIA is not always a helpful guide. Clearer legislative drafting could mitigate the problems of overlap or gaps in the treatment of information. It has been suggested that the Protected Disclosures Act 2000 (section 19) is an example of drafting that clarifies the relationship between the Acts and makes application of the correct piece of information legislation relatively straightforward.

Complaints and remedies

10. It is proposed, at page 150 of the issues paper, that the public duty to comply with an Ombudsman’s decision should be enforceable by the Solicitor-General. While the proposal may be consistent with the Law Officers’ responsibilities for enforcing the law and upholding the rule of law within Government, it raises difficult issues. If there is to be enforcement (and as outlined below, we have doubts about that) it may be preferable that the Ombudsmen undertake that function.

11. The proposal would require the Law Officers, with assistance from Crown Law, to proceed against other agencies of the Crown, potentially breaching the general rule that the Crown cannot bring proceedings against itself, as it is indivisible.

¹ “They must apply the Privacy Act principle 11 disclosure test, except in the context of an official information request...”

12. The proposed approach would place the Solicitor-General and Crown lawyers in a conflict of interest. The Law Officers and Crown Law have as their clients the Executive, including Cabinet, and Government departments. From time to time we provide advice to departments and Ministers to assist them to respond to OIA requests and complaints.
13. The proposal also raises the possibility that the Solicitor-General would decline to enforce the public duty, having reached a different view from the Ombudsmen. It is also possible for the Crown to seek judicial review of recommendations made by the Ombudsmen.
14. All of these concerns suggest that it would be preferable, if such a power is necessary, for the Ombudsmen themselves to enforce their decision.
15. However there are also questions about the necessity for such a power. It is not clear the extent to which Ombudsmen's recommendations are ignored. It appears to occur only rarely. A quick review of the annual reports for the Ombudsmen for the last two years suggests that all recommendations made under the Act by the Ombudsmen were accepted.
16. This suggests that the role of the Ombudsmen is working as intended and that recommendations are accepted in light of the mana of the office and the role of the Ombudsmen as a scrutiny upon the Executive. As noted by then Clerk of the House (now Ombudsman) David McGee QC, that the Ombudsmen have no power to enforce their recommendations is seen as a strength.² The possibility that Ombudsmen should have a power of decision in relation to the release of information was considered but rejected by the Danks Committee.³
17. We would also suggest that failing to act on the Ombudsmen's recommendation may amount to Contempt of Parliament given their position as an officer of Parliament and the public duty to act on the recommendations.

We are happy to discuss these comments in further detail. Please do not hesitate to contact me at justine.falconer@crownlaw.govt.nz.

Yours sincerely

Justine Falconer
 Justine Falconer
 Crown Counsel (Policy)

² David McGee Parliamentary Practice in New Zealand (3rd ed) Wellington 2005 at 77.

³ Towards Open Government General Report of the Committee on Official Information Wellington 1980 at paras 103-106.

Justine Falconer

From: Una Jagose
Sent: Thursday, 23 December 2010 15:48
To: Justine Falconer
Subject: RE: Review of the Official Information Act

Oh, goes to show I should read your attachments before coming up with my 'bright' ideas. But on thinking on it, I think a person would have to say that in proactively releasing stuff they had actually gone through the process of considering withholding, and balancing the public interest etc, before they could est good faith.

Hmm, perhaps a holiday is in order, I hope yours is happy and relaxing.

Una

From: Justine Falconer
Sent: Friday, 17 December 2010 15:08
To: Una Jagose
Subject: RE: Review of the Official Information Act

Sorry for the delay in replying. The Law Commission didn't agree on the question of the immunity – they suggested it would accord privilege against defamation claims and defences to actions for breach of privacy and confidence. They concluded that question should be left to the general law. See page 172 of the issues paper.

On your approach would the person who proactively released be required to show that they had considered grounds for withholding such as privacy before they could establish good faith?
Justine

From: Una Jagose
Sent: Friday, 10 December 2010 8:35
To: Justine Falconer
Subject: RE: Review of the Official Information Act

Our team had nothing. I have not looked at it but my own personal view is that the immunity in s 43(?) could be expanded to provide that good faith publication of information (even if no request) also attracts the immunity – because that's consistent with the purpose of increasing availability...

From: Justine Falconer
Sent: Friday, 26 November 2010 14:53
To: Team Leaders Forum
Subject: Review of the Official Information Act

The Law Commission has published an issues paper for comment by 10 December.
http://www.lawcom.govt.nz/project/review-official-information-act-1982?quicktabs_23=issues_paper

Although we seem not to have as much experience with OIAs as some other departments I expect that there are experts within the office who wish to comment. Would you mind inviting team members to forward any issues to me? People may have encountered issues with the Act which could be resolved via the review.

Aspects of the paper which may be of particular interest are:

-chapter 4 of the paper suggesting changes to "clarify" the good government withholding grounds which are so regularly cited;

-The discussion of the "maintenance of the law" grounds for withholding – not proposing a change but proposing it be extended to other types of inquiries.

-proposed removal of the GG's veto on a recommendation to release information but retaining the ability for the PM or AG to certify against release in certain cases;

-requiring the SG to enforce the public duty to comply with an Ombudsman's recommendation to release;

-chapter 12 on proactive release of information.

-possible re-establishment of an Information Authority.

Comments by Tues 7 December will be gratefully received.

Justine

Justine Falconer

Crown Counsel (Policy)

Crown Law *Te Tari Ture o te Karauna*

www.crownlaw.govt.nz

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OFFICIAL INFORMATION ACT

Justine Falconer

From: Megan Inwood
Sent: Wednesday, 8 December 2010 14:06
To: Justine Falconer
Subject: RE: release of information with conditions

I like it

From: Justine Falconer
Sent: Wednesday, 8 December 2010 12:20
To: Megan Inwood
Subject: release of information with conditions

At page 128 of its report the Law Commission recommends against more specific provisions on conditional release or release with restrictions. It refers to the difficulty of formulating when restrictions might be appropriate, what they might be and then enforcing the conditions.

And I can see the point.

Is the preferable approach to say: I'm not releasing this to you under the OIA and I'm entitled under the OIA to withhold it on these grounds. However, I am prepared to provide a copy to you anyway subject to the following obligations, x, y, z. Please indicate whether you accept those conditions, otherwise no release and you can complain to the Ombudsmen.

What do you think?
Justine

Justine Falconer
Crown Counsel (Policy)
Crown Law *Te Tari Ture o te Karauna*

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Justine Falconer

From: Helen Sims
Sent: Wednesday, 8 December 2010 11:03
To: Justine Falconer
Subject: RE: claims of privilege over previously released information

A client department had released emails and briefings under the OIA over which legal privilege could have been claimed (including summaries of CLO advice!). We then identified those documents as relevant to a proceeding we were doing discovery on. Although we would have preferred to classify the documents as subject to legal advisor privilege, in the end we considered that privilege had effectively been waived due to the release of the documents under the OIA and could not be claimed for the purposes of discovery.

In the case the OIA requestor was one of the group that subsequently issued proceedings – but I'm not sure that would make much difference.

Helen

From: Justine Falconer
Sent: Wednesday, 8 December 2010 10:34
To: Helen Sims
Subject: claims of privilege over previously released information

How did the information come to be released in the case you mentioned?
Justine

Justine Falconer
Crown Counsel (Policy)
Crown Law *Te Tari Ture o te Karauna*

www.crownlaw.govt.nz

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Justine Falconer

From: Helen Sims
Sent: Wednesday, 8 December 2010 10:33
To: Justine Falconer
Subject: statutory reference

It's s 19 of the Protected Disclosures Act:

Confidentiality

(1)

Every person to whom a protected disclosure is made or referred must use his or her best endeavours not to disclose information that might identify the person who made the protected disclosure unless—

(a)

that person consents in writing to the disclosure of that information; or

(b)

the person who has acquired knowledge of the protected disclosure reasonably believes that disclosure of identifying information—

(i)

is essential to the effective investigation of the allegations in the protected disclosure; or

(ii)

is essential to prevent serious risk to public health or public safety or the environment; or

(iii)

is essential having regard to the principles of natural justice.

(2)

A request for information under the Official Information Act 1982 [or under the Local Government Official Information and Meetings Act 1987] (other than one made by a [constable] for the purpose of investigating an offence) may be refused, as contrary to this Act, if it might identify a person who has made a protected disclosure.

[(3)

An Ombudsman may—

(a)

provide information and guidance to organisations and employees concerning the circumstances in which anonymous disclosures of information may be made under this Act; and

(b)

otherwise provide advice and assistance to organisations and other persons in relation to the duty specified in subsection (1).]

Helen Sims

Assistant Crown Counsel

Crown Law *Te Tari Ture o te Karauna*

www.crownlaw.govt.nz

Justine Falconer

From: Megan Inwood
Sent: Tuesday, 7 December 2010 16:36
To: Justine Falconer
Subject: RE: Review of the Official Information Act
Attachments: 863736_Fax from Police dated 9 September 2009.pdf; 894696_ESR seminar_publication of disclosed material.DOC

Hi Justine,

I haven't had time to go through this paper in detail but based on my experience with the Act I have the following comments:

- s 9(2)(h)
- We have recently had the issue of whether restrictions can be placed on information when it is disclosed. The commentaries on the Act suggest you can place restrictions but there is no express provision in the Act (see word **attachment**). The ability to place restrictions may in fact allow greater access to information in some cases where it is concern of widespread disclosure rather than disclosure to a particular individual with a particular interests which is of concern.
- Related to the point above, at present requesters are not required to say why they want information. While this is understandable the reason the information is sought can often have an impact on which way the balance goes in deciding whether the balance favours disclosure or refusal.
- Chapter 3 Persuasive precedent would be very good.
- s 9(2)(h)
- We are very interested in the maintenance of law withholding ground and any development of it.
- It would be useful to clarify the extent to which organisations are required to create/compile information in respect to requests e.g. answer questions, create summaries.
- We have had difficulties on how the OIA and access to court records legislation interacts. ?

Happy to discuss,
Megan

From: Madeleine Laracy
Sent: Tuesday, 30 November 2010 10:22
To: Kate Bicknell; Megan Inwood
Subject: FW: Review of the Official Information Act

Any ideas you'd like to convey on this?

From: Justine Falconer
Sent: Friday, 26 November 2010 14:53
To: Team Leaders Forum
Subject: Review of the Official Information Act

The Law Commission has published an issues paper for comment by 10 December.
http://www.lawcom.govt.nz/project/review-official-information-act-1982?quicktabs_23=issues_paper

Although we seem not to have as much experience with OIAs as some other departments I expect that there are experts within the office who wish to comment. Would you mind inviting team members to forward any issues to me? People may have encountered issues with the Act which could be resolved via the review.

Aspects of the paper which may be of particular interest are:

- chapter 4 of the paper suggesting changes to “clarify” the good government withholding grounds which are so regularly cited;
- The discussion of the “maintenance of the law” grounds for withholding – not proposing a change but proposing it be extended to other types of inquiries.
- proposed removal of the GG’s veto on a recommendation to release information but retaining the ability for the PM or AG to certify against release in certain cases;
- requiring the SG to enforce the public duty to comply with an Ombudsman’s recommendation to release;
- chapter 12 on proactive release of information.
- possible re-establishment of an Information Authority.

Comments by Tues 7 December will be gratefully received.
Justine

Justine Falconer
Crown Counsel (Policy)
Crown Law *Te Tari Ture o te Karauna*

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OFFICIAL INFORMATION ACT

Justine Falconer

From: Helen Sims
Sent: Tuesday, 7 December 2010 14:39
To: Justine Falconer
Subject: RE: OIA Review comments
Attachments: 904601_Review of the OIA and Parts 1-6 LGOIMA.nrl

Hi Justine

Sorry for the delay – I was away sick yesterday and I'm still a little under the weather today.

My comments are attached. I went back through them to try and focus on Crown Law issues, rather than my own personal bugbears! The issue I have flagged about the effect of a department releasing legally privileged material under the OIA on the ability to later claim privilege in a discovery (can privilege be claimed or has it been waived?) was a massive pain for us recently.

I'm happy to discuss or help further with the response,

Helen

Helen Sims
Assistant Crown Counsel

From: Justine Falconer
Sent: Tuesday, 7 December 2010 12:39
To: Helen Sims
Subject: RE: OIA Review comments

How are you getting on Helen?

Here is the start of a letter to the Law commission. TI

f
59(2)(h)

When I'm looking at your comments I'll be looking for issues which highlight why the AG/SG or Crown Law need to take an interest.

Justine

From: Helen Sims
Sent: Friday, 3 December 2010 16:48
To: Justine Falconer
Subject: OIA Review comments

Hi Justine

I haven't quite finished compiling my comments on the Law Commission's Issues Paper – I'll do so on Monday.

Currently the memo addresses:

- The proposed guidance/precedent system
- The privacy withholding ground and interface with the Privacy Act
- Proposed changes to the good government withholding ground
- Proposed amendments relating to public interest

- Ombudsmen role and powers
- Effect (if any) of 'technical' breaches

I'm up to Chapter 10 of the paper. I haven't included any comments about s6(c)/the new ground relating to protection of investigations and inquiries, as that section is quite specific to organisations that carry out investigations or inquiries under statute.

Regards,

Helen Sims

Assistant Crown Counsel

Crown Law *Te Tari Ture o te Karauna*

www.crownlaw.govt.nz

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OFFICIAL INFORMATION ACT

MEMORANDUM

TO: Justine Falconer
FROM: Helen Sims
DATE: 7 December 2010
SUBJECT: Law Commission Issues Paper: Review of the OIA and Parts 1-6 LGOIMA

1. Following our email interchange, I have prepared the following comments about the Law Commission's Issues Paper 18 *The Public's Right to Know: A Review of the Official Information Act 1982 and Parts 1-6 of the Local Government Official Information and Meetings Act 1987* (the paper). Some of the comments respond directly to questions listed in the paper; others are more general comments.
2. As a general point, I consider that the Law Commission's review has been very thorough and responsive to the practical issues faced by organisations that have to apply the OIA and LGOIMA. The Issues Paper balances these issues against the important constitutional principles encapsulated in the OIA and LGOIMA and the interests of requestors of official information.
3. There are some areas which I consider could benefit from further analysis, particularly as the Law Commission seems to intend to substantially re-draft information law. These areas are:
 - 3.1 The proposed development of a system of guidance and precedent to assist in implementing official information obligations;
 - 3.2 The privacy withholding ground and interface with the Privacy Act;
 - 3.3 Proposed changes to the good government withholding ground;
 - 3.4 Principles applicable to proactive release of official information;
 - 3.5 What the effect is of 'technical' breaches of the legislation.

System of guidance and precedence

4. I agree with all of the questions posed in Chapter 3 (questions 10-13), but with a qualification. In relation to paragraph 3.46 and the proposal to develop a system of precedent and/or improved guidelines to assist in the application of the OIA, I agree broadly that guidance should be more "prominent, accessible and well known" (paragraph 3.42). However, I wonder if the system of precedent as proposed might be in tension with broad statement of principle in the OIA. Paragraph 3.46 proposes development of starting point presumptions and precedent guides for application of the OIA, and in particular, to guide the application of the withholding grounds. The problem with this is that the OIA already has a starting point presumption: requested official information should be released to the requestor, unless there is a conclusive or good reason to withhold it. Given the presumption in favour of release and the emphasis on taking a case by case approach to requests, a precedent system would

have to be handled with care. Further attention should be devoted to the broader question of whether it is appropriate and consistent with the OIA for “patterns and principles” (paragraph 3.43) to emerge. I also wonder whether non-lawyers will understand the distinctions between extra-statutory guidance and non-binding precedent systems. There may also be confusion as to how much reliance to place guidance and/or precedent.

5. I do, however, agree that greater guidance is needed to ensure the public interest weighing test is properly performed under s 9 of the OIA. Guidelines would be the most appropriate way to provide greater clarification as to public interest factors to be considered under s 9.

Privacy and interface of OIA with other legislation

6. Although considerable attention has been devoted to personal information privacy by the Law Commission in this Issues paper, and the recent publication on Privacy Law, the interface between the ability to withhold official information to protect privacy under the OIA and the restrictions on release of personal information under the Privacy Act remains unclear. In particular, it is unclear whether reference should be had to the privacy principles and privacy legislation when applying s 9(2)(a) of the OIA, or whether the OIA “trumps” the Privacy Act to the effect that only the public interest weighing test should be applied. Different approaches to this issue are noted in paragraph 6.11. I note that the Ombudsmen and the Privacy Commissioner have different views as to this issue, and that it has also been the subject of deliberation in the courts.¹ If information legislation is to be redrafted, this is an excellent opportunity to resolve this issue. None of the reform options adequately resolve the issue. In particular, the second option for reform introduces the need to consider two variable and confusing terms by requiring an assessment of whether disclosure of information would be “unreasonable” and then whether it may nonetheless be in the “public interest”.
7. More broadly, the interface of the OIA with other legislation remains an issue, for example the Privacy Act, Public Records Act, and Acts that have multiple clauses regulating use and release of information, such as the Climate Change Response Act. Section 52 of the OIA is not always a helpful guide. Clearer legislative drafting could mitigate the problems of overlap or gaps in the treatment of information. The Protected Disclosures Act demonstrates the type of drafting that clarifies the relationship between the Acts and makes application of the correct piece of information legislation relatively straightforward.

8.

s. 9(2)(h)

The good government withholding grounds

9. I consider that the proposed oversight role for the Solicitor-General and changes to the “good government” withholding ground are important for this office. I do not

¹ *Director of Human Rights Proceedings v Commissioner of Police* (unreported, HC, Christchurch, 14 August 2008, CIV-2007-409-2984) French J.

have specific comments to make on these points, although I note that the redrafted withholding ground in paragraph 4.46 may be as equally opaque and difficult to apply in practice as ss 9(f) and (g). Proposed ground (iv) relating to free and frank expression is particularly unwieldy.

- 10. I note, just as a matter of personal opinion, that the good government withholding grounds seem to be the most commonly "used and abused" grounds. In this regard, the grounds would benefit from tightening up and clarification, especially in relation to the temporal aspect of the grounds. During the policy formulation process and consideration of policy options there will often be a strong interest in receiving free and frank opinions and advice and restricting access to them. Once a decision is made, and especially if it accompanies expenditure of public funds, this interest decreases and the public interest in knowing policy options and reasons for decisions will increase.

Proactive release of official information

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S. 9(2)(a)

- 12.

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- 13. In response to the Commission's questions, I agree that proactive release should be encouraged, and that it is not desirable to prescribe types of information that must be proactively released. Some government departments and agencies have significant power to compel information and care must be taken to assess whether proactive publication is permissible and desirable.

- 14. In response to question 91, I do not consider that immunity from criminal or civil proceedings should be extended to cover proactive release, for the reasons given in the Issues Paper.

Effect of "technical" breaches

- 15.

31

S. 9(2)(h)

s 9(2)(h)

16.

17. This raises several questions:

17.1 Where there is no remedial action available, what, if any powers do the Ombudsmen have? More specifically, does an Ombudsman have the power to invalidate a decision?

17.2 More broadly, is the effect of a "technical" breach, for example, of a statutory timeframe, invalidity?

18.

19.

Helen Sims
Assistant Crown Counsel

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(2)(h)

Justine Falconer

From: Helen Sims
Sent: Monday, 29 November 2010 9:21
To: Justine Falconer
Subject: RE: Review of the Official Information Act

Hi Justine

I wrote HDC's submission on the discussion paper - <http://www.hdc.org.nz/media/127351/law%20commission%20-%20review%20of%20official%20information%20legislation.pdf>.

I'm particularly interested in:

- s 6(c)/s 9(2)(ba) and the ability to withhold sensitive information during an investigation - I submitted that the "maintenance of the law" ground in s 6(c) be extended to other types of inquiries;
 - Transfer of requests;
 - Whether "technical" breaches (eg of a time limit) invalidate a decision made under the OIA (I've given advice about this recently);
 - The distinction between OIA requests and what departments most commonly term "Ministerials" (ie requests for a view/opinion on something);
 - The interface of the OIA with other Acts - I
- (S. 9 (2)(h))
- More specifically, the relationship between the 2 information disclosure regimes - the OIA and the Privacy Act.

The requirement of the SG to enforce Ombudsmen recommendations is also very interesting.

I'll give the issues paper a read today/tomorrow and draft some comments by the end of the week - would that suit you in terms of collating a response?

Regards,

Helen

From: Justine Falconer
Sent: Monday, 29 November 2010 9:01
To: Helen Sims
Subject: FW: Review of the Official Information Act

Hi Helen

It's entirely up to you what comments you want to contribute. Read the issues paper and let me have your comments. The file reference is SOL115/2266

Can you let me know the general area you are interested in?

Justine

From: Bronwyn Arthur
Sent: Monday, 29 November 2010 8:38
To: Justine Falconer
Cc: Helen Sims
Subject: RE: Review of the Official Information Act

Justine,

As a Team I doubt we have any more experience than anyone else but Helen is very keen to assist as she has a specific interest in this matter. As the kosher killing of chickens has been resolved in the meantime Helen has a bit of time so can I leave you to directly talk to her about what you would like her to do. Thanks,

Bronwyn

From: Justine Falconer
Sent: Friday, 26 November 2010 14:53
To: Team Leaders Forum
Subject: Review of the Official Information Act

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Aspects of the paper which may be of particular interest are:

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Justine

Justine Falconer
Crown Counsel (Policy)
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