

1. RE: OIA Consultation

**From:** Anna Gruczynska <xxxx.xxxxxxxxxx@xxxxxxxxxxxxxxxxxx.xx.xx>  
**To:** Gavin Clark <xxxxx.xxxxx@xxxx.xx.xx>  
**Sent Date:** Nov 14, 2017 08:38:14  
**Subject:** RE: OIA Consultation  
**Attachment:** [image001.jpg](#)

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Thank you, Gavin.

Our original approach (and one that we would generally follow with OIA requests) was to release any information “caught up” in the request, even if not specifically related to it, unless there were withholding grounds under the OIA.

However, in light of your comments below, and incorporating your feedback, we agree that in this case it is appropriate to take a more literal approach to the request and we have applied additional redactions to only release what is strictly in scope of the request, which is not a lot.

Please let me know if you need to see the revised redactions before they go out.

Thanks

Anna

**Anna Gruczynska**

Governance Officer

Southern Response Earthquake Services Ltd

DDI: (03) [REDACTED]

Ext: [REDACTED]

Mobile: [REDACTED]

PO Box 9052

Christchurch

[www.southernresponse.co.nz](http://www.southernresponse.co.nz)

*Southern Response Earthquake Services Ltd is the government-owned company responsible for settling claims by AMI policyholders for Canterbury earthquake damage which occurred before 5 April 2012 (the date AMI was sold to IAG).*

**From:** Gavin Clark [mailto:xxxxx.xxxxx@xxxx.xx.xx]

**Sent:** Monday, 13 November 2017 1:18 p.m.

**To:** Anna Gruczynska

**Subject:** RE: OIA Consultation

**Sensitivity:** Confidential

Hi Anna,

I have reviewed the content of the intended release and I do have some concerns about this.

If I am clear that the request relates to correspondence around the threat assessment then there is information here that is out of that scope and doesn't appear to have been redacted namely references to:

- Site review
- Directors review and home visits
- Entire email threads on security reviews.

- Response plans for directors
- Risk tool
- Conference call

None of these subject matters above have anything to do with the threat assessment which is a standalone piece of work and in my opinion are not relevant to the specific request.

I ask that the emails and the references to the above in the proposal be withheld.

If you require me to mark-up the specific references and documents please let me know as I am happy to do this.

Kind Regards Gavin

**From:** Anna Gruczynska [mailto:xxxx.xxxxxxxx@xxxxxxxxxxxxxxxxxx.xx.xx]  
**Sent:** Thursday, 9 November 2017 4:10 PM  
**To:** Gavin Clark <xxxxx.xxxxx@xxxx.xx.xx>  
**Subject:** OIA Consultation  
**Sensitivity:** Confidential

Hi Gavin

Hope you are well. As signalled to you in October, we are responding to a further OIA request from [REDACTED] regarding the March 2014 Threat Assessment in which he is asking for “a copy of all emails and documents between Southern Response, TCIL and any other party in relation to the “Threat Assessment” sent to Southern Response on 16 June 2014, including but not limited to:

*Invoices*

*Instructions*

*Engagement*

*Brief*

*Email Conversations and Correspondence”*

We have now reviewed the information which is in scope of this request (not a lot), and propose to release to him the attached documents, subject to redactions as marked, plus one invoice which has already been released, subject to the same redactions as previously applied (not attached as you have already seen it).

On legal advice, we propose to release your proposal to SR from January 2014, subject to redactions of information which we consider is commercially sensitive to TCIL and/or other organisations. The proposed redactions are marked in red.

As on previous occasions, if you have significant concerns regarding the potential release of the information, I would be grateful if you could please set those out in a letter to us as we may require this to support our position in the event of a complaint to the Ombudsman.

The decision on this request is due on Tuesday 14<sup>th</sup> November. Please let me know if you are not able to review and respond by Monday lunchtime.

Thank you and kind regards

Anna

**Anna Gruczynska**

Governance Officer

Southern Response Earthquake Services Ltd

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**From:** Gavin Clark [mailto:xxxxx.xxxxx@xxxx.xx.xx]

**Sent:** Friday, 13 October 2017 2:56 p.m.

**To:** Anna Gruczynska

**Subject:** RE: OIA Consultation

**Sensitivity:** Confidential

Hi Anna,

I've just had a quick look at these and there are some inconsistencies as some services have been redacted and others not. You indicate that you intend to withhold all information revealing the breakdown of services, there are a number of examples where this has not occurred and we wouldn't want any of the description of our services or suite of services made public.

Examples include:

- Risk Management Package
- Risk Management Services
- Director/Projects/Collections

- Collections attend Christchurch

So I would prefer that all of our services are redacted.

I rely upon OIA 1982 Section 9 (2)(b)(i) and (ii) where official information can be withheld where it would disclose a trade secret and where it would likely unreasonably prejudice the commercial position of the person who supplied it.

I would also request that the subtotal amount, GST amounts and total amounts including remittance statements are withheld. The reason for this is that one could simply subtract the visible amounts such as disbursements and come up with the rate, especially in a situation where there is only one service listed in the description.

This request would be based upon the same section of the act as above.

I cant see why the release of this information in the public interest would outweigh our rights to maintain a commercial advantage.

If you require me to go through each invoice and list it by number and provide more detail of what I am outlining above please let me know but I hope that his gives you an appreciation of our situation.

Kind Regards Gavin

**From:** Anna Gruczynska [mailto:xxxx.xxxxxxxx@xxxxxxxxxxxxxxxxxx.xx.xx]

**Sent:** Friday, 13 October 2017 1:46 PM

**To:** Gavin Clark <xxxxx.xxxxx@xxxx.xx.xx>

**Subject:** OIA Consultation

**Importance:** High

**Sensitivity:** Confidential

Hi Gavin

We have received a request under the OIA from [REDACTED] to “provide a copy of all Thompson and Clark invoices tendered to Southern Response Earthquake Services Limited from 4 September 2010 to 25 September 2017”.

As you may recall, some of the invoices were previously released to the Labour Party in response to their request last year. We have applied the same reasoning to the proposed redactions, namely we propose to withhold all information revealing the breakdown of services provided to Southern Response and the cost of these component services, and these disbursements which are charged on a negotiated rate (as opposed to actual cost reimbursement, e.g. flights) which we consider to be information which is commercially sensitive to TCIL.

I attach the bundle of invoices which we intend to release, showing the proposed redactions.

I would appreciate your review and response by COB Wednesday, 18<sup>th</sup> October to allow us to finalise and provide the response within the statutory timeframe.

Thank you

Anna

**Anna Gruczynska**

Governance Officer

Southern Response Earthquake Services Ltd

DDI: (03) [REDACTED]

Ext: [REDACTED]

Mobile: [REDACTED]

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## 2. OIA Consultation

**From:** Anna Gruczynska <xxxx.xxxxxxxxxx@xxxxxxxxxxxxxxxxxxxx.xx.xx>  
**To:** Gavin Clark <xxxxx.xxxxx@xxxx.xx.xx>  
**Sent Date:** Nov 09, 2017 16:09:35  
**Subject:** OIA Consultation  
**Attachment:** [image001.jpg](#)  
[OIA#199 - \[REDACTED\] Threat Assessment Correspondence.docx](#) 18(d)  
[Emails OIA199.pdf](#) 18(d)  
[Southern Response Proposal 150114.pdf](#) 18(d)

---

Hi Gavin

Hope you are well. As signalled to you in October, we are responding to a further OIA request from [REDACTED] regarding the March 2014 Threat Assessment is which he is asking for “a copy of all emails and documents between Southern Response, TCIL and any other party in relation to the “Threat Assessment” sent to Southern Response on 16 June 2014, including but not limited to:

*Invoices*

*Instructions*

*Engagement*

*Brief*

*Email Conversations and Correspondence”*

We have now reviewed the information which is in scope of this request (not a lot), and propose to release to him the attached documents, subject to redactions as marked, plus one invoice which has already been released, subject to the same redactions as previously applied (not attached as you have already seen it).

On legal advice, we propose to release your proposal to SR from January 2014, subject to redactions of information which we consider is commercially sensitive to TCIL and/or other organisations. The proposed redactions are marked in red.

As on previous occasions, if you have significant concerns regarding the potential release of the information, I would be grateful if you could please set those out in a letter to us as we may require

this to support our position in the event of a complaint to the Ombudsman.

The decision on this request is due on Tuesday 14<sup>th</sup> November. Please let me know if you are not able to review and respond by Monday lunchtime.

Thank you and kind regards

Anna

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I rely upon OIA 1982 Section 9 (2)(b)(i) and (ii) where official information can be withheld where it would disclose a trade secret and where it would likely unreasonably prejudice the commercial position of the person who supplied it.

I would also request that the subtotal amount, GST amounts and total amounts including remittance statements are withheld. The reason for this is that one could simply subtract the visible amounts such as disbursements and come up with the rate, especially in a situation where there is only one service listed in the description.

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I cant see why the release of this information in the public interest would outweigh our rights to maintain a commercial advantage.

If you require me to go through each invoice and list it by number and provide more detail of what I am outlining above please let me know but I hope that his gives you an appreciation of our situation.

Kind Regards Gavin

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**Sent:** Friday, 13 October 2017 1:46 PM

**To:** Gavin Clark <xxxxx.xxxxx@xxxx.xx.xx>

**Subject:** OIA Consultation

**Importance:** High

**Sensitivity:** Confidential

Hi Gavin

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As you may recall, some of the invoices were previously released to the Labour Party in response to their request last year. We have applied the same reasoning to the proposed redactions, namely we propose to withhold all information revealing the breakdown of services provided to Southern Response and the cost of these component services, and these disbursements which are charged on a negotiated rate (as opposed to actual cost reimbursement, e.g. flights) which we consider to be information which is commercially sensitive to TCIL.

I attach the bundle of invoices which we intend to release, showing the proposed redactions.

I would appreciate your review and response by COB Wednesday, 18<sup>th</sup> October to allow us to finalise and provide the response within the statutory timeframe.

Thank you

Anna

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Some information in this document has been withheld pursuant to s. 9(2)(a).

Where different withholding grounds apply, these are individually labelled.

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3. RE: OIA Consultation

**From:** Anna Gruczynska <xxxx.xxxxxxxxxx@xxxxxxxxxxxxxxxxxx.xx>  
**To:** Gavin Clark <xxxxx.xxxxx@xxxx.xx.xx>  
**Sent Date:** Oct 17, 2017 11:26:13  
**Subject:** RE: OIA Consultation  
**Attachment:** [image001.jpg](#)

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Hi Gavin

Thank you for your reply.

The approach we have taken with respect to the services provided was that at a high level general descriptions such as “Risk Management Package” (where the detail of what the package comprises is not provided), commercial sensitivity of the information is not apparent - the description is not dissimilar to how those services are advertised on TCIL’s public website. Likewise, it would be difficult to argue that descriptions such as “attendances” or “collections” in themselves are commercially sensitive when there is no detail of what they relate to.

In terms of the amounts, we have withheld the totals and GST where there is only one type of service on the invoice and individual rate could be calculated from the invoice total. Where there are a number of services and disbursements which make such calculation not possible, we did not consider that withholding grounds applied to the invoice totals.

However, we respect TCIL’s position regarding the commercial sensitivity of this information and your request to withhold all service descriptions and all invoice totals. I would appreciate if you could please put your concerns into a formal letter addressed to Casey Hurren, GM – Legal & Strategy for our record in the event of a complaint to the Ombudsman.

At the same time, I need to advise you that yesterday we have received a further OIA request from [REDACTED] regarding the March 2014 Threat Assessment is which he is asking for “a copy of all emails and documents between Southern Response, TCIL and any other party in relation to the “Threat Assessment” sent to Southern Response on 16 June 2014, including but not limited to:

*Invoices*

*Instructions*

*Engagement*

*Brief*

*Email Conversations and Correspondence”*

We will consult with you on our response in due course.

Regards

Anna

**Anna Gruczynska**

Governance Officer

Southern Response Earthquake Services Ltd

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4. RE: Letter re OIA request

**From:** Casey Hurren <xxxxx.xxxxxx@xxxxxxxxxxxxxxxxxxxxx.xx.xx>  
**To:** 'Gavin Clark' <xxxxx.xxxxxx@xxxx.xx.xx>  
**Sent Date:** Sep 27, 2017 11:01:25  
**Subject:** RE: Letter re OIA request  
**Attachment:** [image002.jpg](#)  
[image003.jpg](#)

---

Thanks Gavin

**Casey Hurren**

General Manager Legal & Strategy

**Southern Response**

**Earthquake Services Ltd**

**DDI:** [REDACTED]

PO Box 9052

Christchurch 8149

xxxxx.xxxxxx@xxxxxxxxxxxxxxxxxxxxx.xx.xx

[www.southernresponse.co.nz](http://www.southernresponse.co.nz)

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April 2012 (the date AMI was sold to IAG)

**From:** Gavin Clark [mailto:xxxxx.xxxxx@xxxx.xx.xx]  
**Sent:** Wednesday, 27 September 2017 10:37 a.m.  
**To:** Casey Hurren  
**Subject:** Letter re OIA request

Hi Casey,

As discussed please find attached a letter from us outlining our position in regard to an OIA request and in particular a document titled 'Threat Assessment'.

Kind Regards

**Gavin Clark**

/ MOBILE

/ PHONE

/ FAX

/ POSTAL

/ WEBSITE

+64 [REDACTED]

+64 9 302 0113

+64 9 361 3260

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5. RE: OIA Consultation

**From:** Anna Gruczynska <xxxx.xxxxxxxxxx@xxxxxxxxxxxxxxxxxxxx.xx.xx>  
**To:** Gavin Clark <xxxxx.xxxxx@xxxx.xx.xx>  
**Sent Date:** Dec 20, 2016 10:13:31  
**Subject:** RE: OIA Consultation  
**Attachment:** [image001.jpg](#)  
[Southern Response Weekly Reporting 10-16 July 2015.pdf](#) 18(d)

---

Thanks, Gavin. We will withhold the attachments in Binder 2 – we weren't sure about them so needed your input to make the decision.

The last outstanding question is regarding the Weekly Reports (example attached) – as they are simply a media digest we do not consider them sensitive (but will review each for any privacy concerns), and would be inclined to release them, unless you consider them to be commercially sensitive. Can you please confirm?

Our legal team has reviewed the feedback you have provided on the email bundles and have not raised any concerns regarding the additional redactions you have requested so I am processing them at present.

This is hopefully the end of this one.

Thank you

Anna

**Anna Gruczynska**

Governance Officer

Southern Response Earthquake Services Ltd

DDI: (03) [REDACTED]

Ext: [REDACTED]

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**From:** Gavin Clark [mailto:xxxxx.xxxxx@xxxx.xx.xx]

**Sent:** Tuesday, 20 December 2016 9:43 a.m.

**To:** Anna Gruczynska

**Cc:** xxxx@xxx.xx.xx

**Subject:** RE: OIA Consultation

**Sensitivity:** Confidential

Hi Anna

No problem with binder 1 however binder 2 all slides in relation to training and risk assessment are proprietary and show the how to.

I would consider this eroding our commercial advantage if released.

Kind regards Gavin

Sent from my Sony Xperia™ smartphone

---- Anna Gruczynska wrote ----

Hi Gavin

Thank you for your reply.

We will work through the comments on the email threads and I will come back to you separately if we have any questions or concerns with your proposed additional redactions.

1. In the interest of time, in the first instance, I have reviewed your comments regarding the attachments.

- Attachment to Email 126 (protest photo): we agree this is necessary to withhold to protect the privacy of individuals (9(2)(a)).

- Attachments to Emails 19,20, 51, 52, 78,87 and 88 (TCIL invoices): [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] In Binder 1 (attached) I have provided copies of these invoices with redactions applied on that basis and would welcome your comments. The folder also contains other attachments received from TCIL which we propose to release being generic or publicly available documents, or photos of the exterior of our building which cannot be considered sensitive either in isolation or in the context of the email (which simply says "photos as agreed").

2. In addition, our legal team has questioned whether sufficient commercial sensitivity grounds exist to withhold the following (which I considered to contain proprietary methodology material which is commercially sensitive to TCIL, but would appreciate your view on this):

- SRES Characterisation Survey 2016 (blank) – refer Binder 2

- SRES SG test – refer Binder 2

- First Responders Role Plays Agenda – refer Binder 2

- Southern Response weekly monitoring reports - I have not provided them here, but I am sure you are familiar with the documents, of which there are approx. 45. The information contained in these reports does not appear to be sensitive in itself, being largely of the media monitoring type, but you may have concerns regarding the criteria on which these reports were

prepared being released.

I would be most grateful if you could consider the matter of the invoices in Binder 1 and the 4 types of documents in Binder 2 and let me know of any concerns with this information being released.

Thank you

Anna

**Anna Gruczynska**

Governance Officer

Southern Response Earthquake Services Ltd

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**From:** Gavin Clark [mailto:xxxxx.xxxxx@xxxx.xx.xx]  
**Sent:** Monday, 12 December 2016 10:54 a.m.  
**To:** Anna Gruczynska  
**Cc:** xxxx@xxx.xx.xx  
**Subject:** RE: OIA Consultation  
**Sensitivity:** Confidential

Hi Anna,

Please find attached my response to this OIA request which centres around what I consider to be our IP.

Re your question below the weekly reports are the collection of open source information and I have no issue with their release.

Kind Regards Gavin

**From:** Anna Gruczynska [mailto:xxxx.xxxxxxxxxx@xxxxxxxxxxxxxxxxxx.xx.xx]  
**Sent:** Friday, 25 November 2016 3:10 p.m.  
**To:** Gavin Clark  
**Subject:** RE: OIA Consultation  
**Sensitivity:** Confidential

Thank you, Gavin, that's great. In addition, can I please ask you to consider and advise whether you have any concerns if we release the weekly reports TCIL has been providing to us. These are mostly scans of the media and social media and as such don't contain sensitive or confidential information but we thought you might consider them to be part of your commercially sensitive methodology.

Thank you

Anna



**Anna Gruczynska**

Governance Officer

Southern Response Earthquake Services Ltd

DDI: (03) [REDACTED]

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**From:** Gavin Clark [mailto:xxxxx.xxxxx@xxxx.xx.xx]

**Sent:** Friday, 25 November 2016 2:45 p.m.

**To:** Anna Gruczynska

**Subject:** RE: OIA Consultation

**Sensitivity:** Confidential

Thanks Anna email received, I've had a busy week but will come back to you early next week if that is okay with you.

**From:** Anna Gruczynska [mailto:xxxx.xxxxxxxxx@xxxxxxxxxxxxxxxxxx.xx.xx]

**Sent:** Tuesday, 22 November 2016 1:21 p.m.

**To:** Gavin Clark  
**Subject:** OIA Consultation  
**Importance:** High  
**Sensitivity:** Confidential

Hi Gavin

Southern Response has received a request from the Labour Party under the OIA for a copy of any communications, including emails, between Southern Response and any private investigation firm, since 1 January 2014 (subsequently narrowed down to cover the period 1 July 2015 – 30 June 2016 only). The request is also for copies of any reports, briefings and advice received by Southern Response.

We have reviewed the email communications we hold which are within the scope of this request and would like to consult with you on our proposed response, in the first instance as it concerns email communications only. We are reviewing the various attachments (which will also respond to the second part of the request for reports, briefings and advice) and will consult with you on those separately. In the meantime I would be grateful if you could review the attached information and let me know if you have concerns with any of it being released. The information we consider necessary to withhold, and which will therefore be redacted, is within the red boxes. Any unmarked information is currently proposed to be released, subject to consultation with you.

In general terms, we have considered it necessary to withhold the following information:

- Any discussion in detail of the security-related work TCIL undertook for SR, both to protect the SR's security information and to protect TCIL's commercially sensitive methodology
- Any discussion of specific safety information (recommendations etc.) to protect SR's security information
- Any discussion about the cost of specific services provided to SRES as we consider this to be commercially sensitive to TCIL (noting that the general information about amounts paid to TCIL has been previously released)
- Names of individuals, and details of individuals' residential security reviews, information requests etc. in order to protect their privacy

We intend to apply a similar rationale to determining which attachments need to be withheld in their entirety/with redactions, and our preliminary views can be gauged from the proposed redactions in the "Attachment" field of the emails.

Once you've had a chance to look through these communications, please let me know your estimated timeframe to come back to me with your specific comments. As we have already advised the decision on this request, there is no statutory deadline to provide the information, however we are obliged to provide it as soon as possible, and are certainly hoping to be in a position to do so this side of Christmas.

If you have any questions, or require clarification, please do not hesitate to give me a call.

Thank you

Anna

**Anna Gruczynska**

Governance Officer

Southern Response Earthquake Services Ltd

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6. RE: OIA Consultation

**From:** Anna Gruczynska <xxxx.xxxxxxxxxx@xxxxxxxxxxxxxxxxxxxx.xx.xx>  
**To:** Gavin Clark <xxxxx.xxxxx@xxxx.xx.xx>  
**Cc:** xxxx@xxx.xx.xx <xxxx@xxx.xx.xx>  
**Sent Date:** Dec 13, 2016 14:25:36  
**Subject:** RE: OIA Consultation  
**Attachment:** [image001.jpg](#)  
[Binder1 - Attachments FROM TCIL to release.pdf](#) 18(d)  
[Binder2 - to consult.pdf](#) 18(d)

---

Hi Gavin

Thank you for your reply.

We will work through the comments on the email threads and I will come back to you separately if we have any questions or concerns with your proposed additional redactions.

1. In the interest of time, in the first instance, I have reviewed your comments regarding the attachments.

- Attachment to Email 126 (protest photo): we agree this is necessary to withhold to protect the privacy of individuals (9(2)(a)).

- Attachments to Emails 19,20, 51, 52, 78,87 and 88 (TCIL invoices): 9(2)(h) [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED] In Binder 1 (attached) I have provided copies of these invoices with redactions applied on that basis and would welcome your comments. The folder also contains other attachments received from TCIL which we propose to release being generic or publicly available documents, or photos of the exterior of our building which cannot be considered sensitive either in isolation or in the context of the email (which simply says "photos as agreed").

2. In addition, our legal team has questioned whether sufficient commercial sensitivity grounds exist to withhold the following (which I considered to contain proprietary methodology material which is commercially sensitive to TCIL, but would appreciate your view on this):

- SRES Characterisation Survey 2016 (blank) – refer Binder 2
- SRES SG test – refer Binder 2
- First Responders Role Plays Agenda – refer Binder 2
- Southern Response weekly monitoring reports - I have not provided them here, but I am sure you are familiar with the documents, of which there are approx. 45. The information contained in these reports does not appear to be sensitive in itself, being largely of the media monitoring type, but you may have concerns regarding the criteria on which these reports were prepared being released.

I would be most grateful if you could consider the matter of the invoices in Binder 1 and the 4 types of documents in Binder 2 and let me know of any concerns with this information being released.

Thank you

Anna

**Anna Gruczynska**

Governance Officer

Southern Response Earthquake Services Ltd

DDI: (03) [REDACTED]

Ext: [REDACTED]

Mobile: [REDACTED]

PO Box 9052

Christchurch

7. RE: OIA Consultation

**From:** Anna Gruczynska <xxxx.xxxxxxxxxx@xxxxxxxxxxxxxxxxxx.xx.xx>  
**To:** Gavin Clark <xxxxx.xxxxx@xxxx.xx.xx>  
**Sent Date:** Nov 25, 2016 15:09:44  
**Subject:** RE: OIA Consultation  
**Attachment:** [image001.jpg](#)

---

Thank you, Gavin, that's great. In addition, can I please ask you to consider and advise whether you have any concerns if we release the weekly reports TCIL has been providing to us. These are mostly scans of the media and social media and as such don't contain sensitive or confidential information but we thought you might consider them to be part of your commercially sensitive methodology.

Thank you

Anna

**Anna Gruczynska**

Governance Officer

Southern Response Earthquake Services Ltd

DDI: (03) [REDACTED]

Ext: [REDACTED]

Mobile: [REDACTED]

PO Box 9052

Christchurch

[www.southernresponse.co.nz](http://www.southernresponse.co.nz)

*Southern Response Earthquake Services Ltd is the government-owned company responsible for settling claims by AMI policyholders for Canterbury earthquake damage which occurred before 5 April 2012 (the date AMI was sold to IAG).*

**From:** Gavin Clark [mailto:xxxxx.xxxxx@xxxx.xx.xx]  
**Sent:** Friday, 25 November 2016 2:45 p.m.  
**To:** Anna Gruczynska  
**Subject:** RE: OIA Consultation  
**Sensitivity:** Confidential

Thanks Anna email received, I've had a busy week but will come back to you early next week if that is okay with you.

**From:** Anna Gruczynska [mailto:xxxx.xxxxxxxxx@xxxxxxxxxxxxxxxxxx.xx.xx]  
**Sent:** Tuesday, 22 November 2016 1:21 p.m.  
**To:** Gavin Clark  
**Subject:** OIA Consultation  
**Importance:** High  
**Sensitivity:** Confidential

Hi Gavin

Southern Response has received a request from the Labour Party under the OIA for a copy of any communications, including emails, between Southern Response and any private investigation firm, since 1 January 2014 (subsequently narrowed down to cover the period 1 July 2015 – 30 June 2016 only). The request is also for copies of any reports, briefings and advice received by Southern Response.

We have reviewed the email communications we hold which are within the scope of this request and would like to consult with you on our proposed response, in the first instance as it concerns email communications only. We are reviewing the various attachments (which will also respond to the second part of the request for reports, briefings and advice) and will consult with you on those separately. In the meantime I would be grateful if you could review the attached information and let me know if you have concerns with any of it being released. The information we consider



## 8. OIA Consultation

**From:** Anna Gruczynska <xxxx.xxxxxxxxxx@xxxxxxxxxxxxxxxxxxxx.xx.xx>  
**To:** xxxxx.xxxxx@xxxx.xx.xx <xxxxxx.xxxxx@xxxx.xx.xx>  
**Sent Date:** Nov 22, 2016 13:21:03  
**Subject:** OIA Consultation  
**Attachment:** [image001.jpg](#)  
[Bundle 1 - Emails FROM TCIL.pdf](#) 18(d)  
[Bundle 2 - Emails TO TCIL.pdf](#) 18(d)

---

Hi Gavin

Southern Response has received a request from the Labour Party under the OIA for a copy of any communications, including emails, between Southern Response and any private investigation firm, since 1 January 2014 (subsequently narrowed down to cover the period 1 July 2015 – 30 June 2016 only). The request is also for copies of any reports, briefings and advice received by Southern Response.

We have reviewed the email communications we hold which are within the scope of this request and would like to consult with you on our proposed response, in the first instance as it concerns email communications only. We are reviewing the various attachments (which will also respond to the second part of the request for reports, briefings and advice) and will consult with you on those separately. In the meantime I would be grateful if you could review the attached information and let me know if you have concerns with any of it being released. The information we consider necessary to withhold, and which will therefore be redacted, is within the red boxes. Any unmarked information is currently proposed to be released, subject to consultation with you.

In general terms, we have considered it necessary to withhold the following information:

- Any discussion in detail of the security-related work TCIL undertook for SR, both to protect the SR's security information and to protect TCIL's commercially sensitive methodology
- Any discussion of specific safety information (recommendations etc.) to protect SR's security information
- Any discussion about the cost of specific services provided to SRES as we consider this to be commercially sensitive to TCIL (noting that the general information about amounts paid to TCIL has been previously released)

- Names of individuals, and details of individuals' residential security reviews, information requests etc. in order to protect their privacy

We intend to apply a similar rationale to determining which attachments need to be withheld in their entirety/with redactions, and our preliminary views can be gauged from the proposed redactions in the "Attachment" field of the emails.

Once you've had a chance to look through these communications, please let me know your estimated timeframe to come back to me with your specific comments. As we have already advised the decision on this request, there is no statutory deadline to provide the information, however we are obliged to provide it as soon as possible, and are certainly hoping to be in a position to do so this side of Christmas.

If you have any questions, or require clarification, please do not hesitate to give me a call.

Thank you

Anna

**Anna Gruczynska**

Governance Officer

Southern Response Earthquake Services Ltd

DDI: (03) [REDACTED]

Ext: [REDACTED]

Mobile: [REDACTED]

PO Box 9052

Christchurch

**www.southernresponse.co.nz**

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9. RE: OIA from [REDACTED] - complaint

**From:** [REDACTED] <[REDACTED]southernresponse.co.nz>  
**To:** 'Gavin Clark' <xxxxx.xxxxx@xxxx.xx.xx>  
**Cc:** [REDACTED] <[REDACTED]bellgully.com>, [REDACTED]t60.co.nz  
<[REDACTED]t60.co.nz>, Anna Gruczynska  
<xxxx.xxxxxxxxxx@xxxxxxxxxxxxxxxxxx.xx.xx>  
**Sent Date:** Sep 21, 2016 10:41:16  
**Subject:** RE: OIA from [REDACTED] - complaint  
**Attachment:** [image004.jpg](#)  
[image005.jpg](#)  
[image006.jpg](#)  
[image007.jpg](#)  
[image008.jpg](#)  
[image001.jpg](#)

---

Thanks Gavin,

I can confirm that these paragraphs were the only ones questioned and discussed with us. The rest wasn't questioned and the Ombudsman's office, as far as I am aware, was satisfied with our reasons for with-holding the information. Regarding these particular paragraphs they transferred it to the Privacy Commissioner asking them to review from the privacy point of view and that's when the Privacy Commissioner's office approached us.

Trust this helps.

And thank you for your comments below. This is definitely of benefit and will help us firm up our letter to the Privacy Commissioner.

Kind regards

[REDACTED] ANZIIF (Assoc) CIP

Privacy and Information Officer

Southern Response Earthquake Services Ltd

DDI (03) [REDACTED]

Ext [REDACTED]

PO Box 9052

Christchurch

[www.southernresponse.co.nz](http://www.southernresponse.co.nz)

-

*Southern Response Earthquake Services Ltd is the government-owned company responsible for settling claims by AMI policyholders for Canterbury earthquake damage which occurred before 5 April 2012 (the date AMI was sold to IAG).*

**From:** Gavin Clark [mailto:xxxxx.xxxxx@xxxx.xx.xx]

**Sent:** Wednesday, 21 September 2016 10:30 a.m.

**To:** [REDACTED]

**Cc:** [REDACTED] t60.co.nz

**Subject:** RE: OIA from [REDACTED] - complaint

Hi [REDACTED]

Based upon your correspondence below I take it that [REDACTED] complaint to the Ombudsman relates solely to our report and in particular the paragraphs highlighted below, Paras 54 to 57, 60, 63, 73 and 74. Can you advise whether any other parts that have been withheld from [REDACTED] are under consideration by the Ombudsman?

Our original response to this request and the withholding of information from T&C was sent via email to Victor Wells on 11 February 2016 and specifically referred to email parts that had been sent to us and contained relevant information and relied upon sections 9(2)(b)(i)- disclosing trade secrets and section 9(2)(b)(ii) prejudice our commercial position. The email containing the information from Victor Wells was in 11 parts due to the size of each email file. These reasons for

withholding particular information are still current however in regard to this matter below I can respond to these specific paragraphs as follows:

**Para 54 to 57**

[REDACTED]

[REDACTED]

[REDACTED]

**Para 60**

Is also a recommendation from T&C and we believe that all recommendations around security should not be disclosed so as not to reveal security tactics and create a security vulnerability putting people at risk. Section 6(d) Safety of any person.

**Para 63**

[REDACTED]

**Para 73 and 74**

[REDACTED]

We trust that this helps clarify our position on the matter and appreciate having been consulted regarding information that we have provided to SRES.

Take care warm regards Gavin Clark

**Gavin Clark**

/ MOBILE

/ PHONE

/ FAX

/ POSTAL

/ WEBSITE

+64 [REDACTED]

+64 9 302 0113

+64 9 361 3260

PO Box 301775, Albany, NSMC 0752, New Zealand

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**From:** [REDACTED] [mailto:[REDACTED@southernresponse.co.nz]]  
**Sent:** Monday, 19 September 2016 11:53 a.m.  
**To:** Gavin Clark  
**Cc:** [REDACTED]  
**Subject:** OIA from [REDACTED] - complaint

Hi, Gavin

It's been a while since we spoke. Trust all is well with you.

We have recently been contacted by the Ombudsman office and subsequently by the Privacy Commissioner office in relation to [REDACTED] making a complaint earlier in the year about how we responded to his OIA request which he made in September 2015 . As the Ombudsman office thought that parts of the information which we withheld related more to privacy, they transferred that part to the Privacy Commissioner. [REDACTED] from the Privacy Commissioner's office met with us last week and upon discussion of the few points raised in her original letter and we came to some agreement that our withholding reasons and grounds were justified.

One of the points raised was in relation to the TCIL report about [REDACTED]

In regards to it, we have been asked to provide a bit more information to support our decisions to withhold, hence I thought I'd e-mail you.

I've got these e-mails attached between you and Victor where you were talking about the sensitivity of information in the staff presentation etc however I couldn't find any specific correspondence about the [REDACTED] report . Will it be fair to assume that your comments in Feb 2016 would apply to [REDACTED] report as well or would TCIL like to comment again on the paragraphs which were withheld and are being questioned?



I have copied in [REDACTED] from Bell Gully, who is assisting us with our communication to the Privacy Commissioner on this complaint.

Kind regards,

[REDACTED] **ANZIIF (Assoc) CIP**

Privacy and Information Officer

Southern Response Earthquake Services Ltd

DDI (03) [REDACTED]

Ext [REDACTED]

PO Box 9052

Christchurch

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10. OIA from [REDACTED] - complaint

**From:** [REDACTED] <[REDACTED]southernresponse.co.nz>  
**To:** 'Gavin Clark' <xxxxx.xxxxx@xxxx.xx.xx>  
**Cc:** [REDACTED] <[REDACTED]bellgully.com>  
**Sent Date:** Sep 19, 2016 11:52:32  
**Subject:** OIA from [REDACTED] - complaint  
**Attachment:** [image002.jpg](#)  
[image004.jpg](#)  
[image006.jpg](#)  
[TCIL e-mails re sensitivity.pdf](#) 18(d)  
[Report re current risk to Southern Response.pdf](#) 18(d)  
[Report\\_RedactedWM.pdf](#) 18(d)

---

Hi, Gavin

It's been a while since we spoke. Trust all is well with you.

We have recently been contacted by the Ombudsman office and subsequently by the Privacy Commissioner office in relation to [REDACTED] making a complaint earlier in the year about how we responded to his OIA request which he made in September 2015 . As the Ombudsman office thought that parts of the information which we withheld related more to privacy, they transferred that part to the Privacy Commissioner. [REDACTED] from the Privacy Commissioner's office met with us last week and upon discussion of the few points raised in her original letter and we came to some agreement that our withholding reasons and grounds were justified.

One of the points raised was in relation to the TCIL report about [REDACTED]

In regards to it, we have been asked to provide a bit more information to support our decisions to withhold, hence I thought I'd e-mail you.

I've got these e-mails attached between you and Victor where you were talking about the sensitivity of information in the staff presentation etc however I couldn't find any specific correspondence about the [REDACTED] report . Will it be fair to assume that your comments in Feb 2016 would apply to [REDACTED] report as well or would TCIL like to comment again on the paragraphs which were withheld and are being questioned?

I have copied in [REDACTED] from Bell Gully, who is assisting us with our communication to the Privacy Commissioner on this complaint.

Kind regards,

[REDACTED] ANZIIF (Assoc) CIP

Privacy and Information Officer

Southern Response Earthquake Services Ltd

DDI (03) [REDACTED]

Ext [REDACTED]

PO Box 9052

Christchurch

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-

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11. RE: Paid informing

**From:** [REDACTED] <[REDACTED]@southernresponse.co.nz>  
**To:** Gavin Clark <xxxxx.xxxxx@xxxx.xx.xx>  
**Sent Date:** Mar 18, 2016 12:25:26  
**Subject:** RE: Paid informing  
**Attachment:**

---

The letter looks good to me Gavin.

Kind regards  
[REDACTED]

-----Original Message-----

**From:** Gavin Clark [mailto:xxxxx.xxxxx@xxxx.xx.xx]  
**Sent:** Friday, 18 March 2016 10:00 a.m.  
**To:** [REDACTED]  
**Cc:** Anna Gruczynska; Victor Wells; Linda Falwasser  
**Subject:** RE: Paid informing

Hi [REDACTED]

Please see attached proposed response to [REDACTED]

If you wouldn't mind casting an eye over it to make sure that it looks okay I will then send it to him and then formally notify you once done.

Kind Regards Gavin Clark

-----Original Message-----

**From:** [REDACTED] [mailto:[REDACTED]@southernresponse.co.nz]  
**Sent:** Thursday, 17 March 2016 3:31 p.m.  
**To:** Gavin Clark  
**Cc:** Anna Gruczynska; Victor Wells  
**Subject:** FW: Paid informing

Hi Gavin

Anna asked me to look into whether you should include a sentence about contacting the Privacy Commissioner.

Section 39 of the Privacy Act only provides that where an agency transfers a request, it must

12. RE: RE: Paid informing

**From:** [REDACTED] <[REDACTED]@southernresponse.co.nz>  
**To:** Gavin Clark <xxxxx.xxxxx@xxxx.xx.xx>  
**Cc:** Victor Wells <xxxxxxx.xxxxx@xxxxxxxxxxxxxxxxxxxxxx.xx.xx>, Linda Falwasser <xxxxxx.xxxxxxxxxx@xxxxxxxxxxxxxxxxxxxxxx.xx.xx>  
**Sent Date:** Mar 16, 2016 15:07:09  
**Subject:** RE: RE: Paid informing  
**Attachment:**

---

Probably best just to keep the line of separation clear and include a sentence at the end indicating that you will ensure that this transfer is passed onto the appropriate person within Southern Response (particularly given Victor no longer deals with [REDACTED] OIA requests).

Kind regards  
[REDACTED]

-----Original Message-----

**From:** Gavin Clark [mailto:xxxxx.xxxxx@xxxx.xx.xx]  
**Sent:** Wednesday, 16 March 2016 2:33 p.m.  
**To:** [REDACTED]  
**Cc:** Victor Wells; Linda Falwasser  
**Subject:** RE: RE: Paid informing

Thanks [REDACTED] should I include Victor in the email to [REDACTED] which officially notifies SRES of our intention or respond to [REDACTED] and notify SRES independently?

Kind Regards Gavin Clark

-----Original Message-----

**From:** [REDACTED] [mailto:[REDACTED]@southernresponse.co.nz]  
**Sent:** Wednesday, 16 March 2016 2:22 p.m.  
**To:** Gavin Clark  
**Cc:** Victor Wells; Linda Falwasser  
**Subject:** RE: RE: Paid informing

Hi Gavin

Some proposed wording is set out below should TCIL decide to transfer this request. Please note the last comment, which TCIL will need to satisfy itself of in order to discharge its Privacy Act obligations in respect of this request.

Also, as you're probably aware, there is a 10 working day time limit to transfer a request under section 39.

Kind regards

[Redacted]

Dear [Redacted]

We are transferring your Privacy Act 1993 request (dated 7 March 2016) to Southern Response Earthquake Services Limited, who we believe are more appropriately placed to deal with your request. For completeness, in this request you asked that TCIL provides:

[Redacted]

[Redacted]

[Redacted]

[Redacted]

In transferring your request, TCIL relies on section 39 of the Privacy Act, which provides that where the information privacy request is made to an agency and is believed by the person dealing with the request to be more closely connected with the functions or activities of another agency, the agency shall promptly transfer the request to the other agency.

-----Original Message-----

From: Gavin Clark [mailto:xxxxx.xxxxx@xxxx.xx.xx]

Sent: Wednesday, 16 March 2016 2:16 p.m.

To: Victor Wells; Linda Falwasser

Cc: [Redacted]

Subject: RE: RE: Paid informing



Thankyou

-----Original Message-----

From: Victor Wells [mailto:xxxxxx.xxxxx@xxxxxxxxxxxxxxxxxx.xx.xx]  
Sent: Wednesday, 16 March 2016 2:08 p.m.  
To: Gavin Clark; Linda Falwasser  
Cc: [REDACTED]  
Subject: RE: RE: Paid informing

Hi Gavin,

[REDACTED] will send you through some content that you may choose to use in your correspondence with [REDACTED] if you decide to transfer the request.

Victor Wells  
Legal Risk Manager

-----Original Message-----

From: Gavin Clark [mailto:xxxxx.xxxxx@xxxx.xx.xx]  
Sent: Tuesday, 15 March 2016 3:15 p.m.  
To: Victor Wells; Linda Falwasser  
Subject: RE: RE: Paid informing

Ah I probably inadvertently sent them to the board with reply all.

I still intend to deal with the matter as we have previously discussed if that still suits.

Cheers

-----Original Message-----

From: Victor Wells [mailto:xxxxxx.xxxxx@xxxxxxxxxxxxxxxxxx.xx.xx]  
Sent: Tuesday, 15 March 2016 2:59 p.m.  
To: Gavin Clark; Linda Falwasser  
Subject: RE: RE: Paid informing

Thanks Gavin,

[REDACTED] emails to our Board do not get delivered. He knows this and continues to go through the pantomime of copying them in to make a point. I will call you tomorrow regards the

management of his request.

Regards

Victor Wells  
Legal Risk Manager

-----Original Message-----

From: Gavin Clark [mailto:xxxxx.xxxxx@xxxx.xx.xx]  
Sent: Tuesday, 15 March 2016 2:33 p.m.  
To: Linda Falwasser; Victor Wells  
Subject: FW: RE: Paid informing

Hi Guys

FYI.

-----Original Message-----

From: Gavin Clark  
Sent: Tuesday, 15 March 2016 2:31 p.m.  
To: [REDACTED]  
Cc: xxx.xxxxxx@xxxxxxxxxxxxxxxxxx.xx.xx; xxx.xxxxxx@xxxxxxxxxxxxxxxxxx.nz;  
xxxx.xxxxxxx@xxxxxxxxxxxxxxxxxx.xx.xx; xxx.xxxxxxx@xxxxxxxxxxxxxxxxxx.nz;  
xxxx.xxxxxxx@xxxxxxxxxxxxxxxxxx.xx.xx; xxx.xxxxxx@xxxxxxxxxxxxxxxxxx.nz  
Subject: RE: RE: Paid informing

Dear [REDACTED]

As per this email thread below I have answered your question in good faith totally upon my own volition.

Your Privacy Act request has been noted as previously advised and I will respond accordingly, you do not dictate the time frame this is written in statute.

You will receive correspondence from me in due course and I will no longer respond to your requests in the interim.

Thank you Gavin Clark

-----Original Message-----

Email thread withheld pursuant to s. 9(2)(a) of the OIA

13. RE: Response to OIA request

**From:** Victor Wells <xxxxxx.xxxxx@xxxxxxxxxxxxxxxxxx.xx.xx>  
**To:** 'Gavin Clark' <xxxxx.xxxxx@xxxx.xx.xx>  
**Sent Date:** Feb 12, 2016 10:53:53  
**Subject:** RE: Response to OIA request  
**Attachment:** [image001.jpg](#)

---

No problem Gavin,

We can redact the 'individuals' page in its entirety. Are you happy for the protest picture of [REDACTED] to be released? And the title page of the presentation noting that it is 'First Responder Training'?

Regards

**Victor Wells**

Legal Risk Manager

**From:** Gavin Clark [mailto:xxxxx.xxxxx@xxxx.xx.xx]  
**Sent:** Friday, 12 February 2016 10:42 a.m.  
**To:** Victor Wells  
**Subject:** RE: Response to OIA request

Thanks Victor,

Can you give me an indication what ones you are seeking clarification on? If these are from us I may have an opinion and could provide a better understanding of our position on it.

I am still opposed to the entire slide titled 'Individuals' being published based upon the grounds that this slide shows technique (our formula) in that individuals are profiled as well as an indication that other people were discussed during this training.

As you are aware the time commitment to your organisation as a result of one vexatious disaffected individual is huge and if it were publically known that T&C discussed actions by specific individuals in a training package to Southern Response then this could quite possibly open a can of worms and cause our business major disruption as the remaining three individuals out of a pool of hundreds would be wanting to know if it was them in the presentation. We could be hugely impacted by a multiple of unnecessary Privacy Act requests and enquiries to us and as a small organisation (not a government funded organisation) we aren't geared up to handle such issues and would impact upon us financially.

We are basing this position upon previous experience having undergone major disruption to our business commencing in 2007 and the flow on effect of losing clients, time and distraction commitment as well as legal challenges that resulted in our firm having to go to court to defend frivolous vexatious claims. Such is the nature of disaffected individuals that are driven enough to the point of taking extreme measures (pertinent example sending long winded unnecessary emails on a daily basis grinding down the wheels of efficiency) that they then focus on another target to impact upon that organisation. This secondary economic targeting is common place and there are many references of this being done throughout the world and shows a common link to strategy used by Issue Motivated Groups and individuals.

I don't believe that the release of this slide would be in the public interest and firmly believe that any public interest is outweighed by the likelihood of unreasonably prejudicing our commercial position.

I further believe that any slide of this nature reveals to our competitors part thereof our successful formula on dealing with IMG's and IMI's.

I request that Southern Response Err on the side of caution and black out the entire slide headed 'Individuals' if there is a subsequent challenge and the matter is referred to the Ombudsman for a decision then request that Thompson & Clark be notified in a timely manner so that we can prepare an appropriate response to the Ombudsman's office outlining our position.

Victor, I'm not trying to be difficult here but having the benefit of hindsight and experience definitely believe that we are on the top of a precipice on this matter and that we need to take these measures to protect our business.

Kind Regards Gavin

14. RE: Response to OIA request

**From:** Victor Wells <xxxxxx.xxxxx@xxxxxxxxxxxxxxxxxx.xx.xx>  
**To:** 'Gavin Clark' <xxxxx.xxxxx@xxxx.xx.xx>  
**Cc:** xxxx@xxx.xx.xx <xxxx@xxx.xx.xx>, Linda Falwasser  
<xxxxx.xxxxxxx@xxxxxxxxxxxxxxxxxx.xx.xx>  
**Sent Date:** Feb 12, 2016 09:49:18  
**Subject:** RE: Response to OIA request  
**Attachment:** [image001.jpg](#)  
[Part 1 - proposed release info\\_Redacted](#) 18(d)  
[ver2\\_RedactedWM\\_Part5\\_Redacted.pdf](#) 18(d)  
[ltr - OIA - \[REDACTED\] - Security Request.docx](#) 9(2)(a)

---

Thanks Gavin,

We are fine with the majority of the redactions but there are a couple we want to seek further clarification on.

We are proposing to leave in the front page of the training as this doesn't provide any detail about methodology or IMG's? It also means we don't need to redact further references to the training in emails to staff etc?

We have also left in the photographs of [REDACTED] because they dont provide any detail about methodology or IMG's also? They have also been sourced from publicly available information such that our ability to withhold them is low.

We have also left in the title of the Trespass Act slide given it is simply a reference to the legislation.

I have also attached the letter that we intend to send with the release.

Let me know your thoughts.

Regards

**Victor Wells**

Legal Risk Manager

**From:** Gavin Clark [mailto:xxxxx.xxxxx@xxxx.xx.xx]  
**Sent:** Thursday, 11 February 2016 11:57 a.m.  
**To:** Victor Wells  
**Cc:** xxxx@xxx.xx.xx  
**Subject:** Response to OIA request

Hi Victor,

Further to our discussion thank you for your 11 part emails dated 5 February 2016 detailing the intended disclosure under the Official Information Act.

I have contained my responses as follows to commenting on the redacted versions sent in emails part 5 to 11.

**Part 5**

No issues from T&C.

**Part 6**

No issues from T&C

**Part 7**

We note that this report from T&C is the final report (indicated to us by an amendment in para 6) however page 18 on part 1 of 11 shows the draft report, please note for future reference that the redacted version in part 7 of 11 is the correct version of the report and not the version shown in part 1 of 11.

## Part 8

No issues from T&C

## Part 9

Pages 5-13 and 16 -18

T&C is opposed to any information regarding our training presentation being made public as this will disclose a trade secret 9(2)(b)(i) and will be likely to prejudice our commercial position Sec 9(2)(b)(ii).

Our position is based upon the following reasons.

1. Thompson &Clark for the past 12 years has been providing risk management services to companies that are affected by issue motivated groups and individuals and over this period has gained a great deal of intellectual property about the methodology of such groups. With this knowledge we have put together training packages such as "First Responders Training". The release of this training package or part thereof would provide our competitors with our formula and a basis to replicate our service.

2. Thompson &Clark currently has 9(2)(b)(ii) paying a monthly retainer for monitoring services around specific issues that are likely to affect those company's, we then assess the information and provide relevant mitigation to manage the risk. The first responders training formula is derived from this understanding of IMG's and if our competitors were to learn of this 'formula' they would most likely erode our client base.

3. In 2007 Thompson &Clark were subjected to a vexatious campaign from an issue motivated group who attempted to erode our clients confidence in our service and company which resulted in T&C losing some clients and was a major distraction to us and our business for several years. The release of this training package would indicate to IMG's that T&C is still providing risk management services to company's affected by IMG's T&C strongly believe that as part of IMG's strategy they would most likely to start a public campaign to impact on our business as they did in 2007.

Page 5- Covering sheet for First Responders Training. T&C opposed to this release as per points 1 and 2 above.

Page 6- Objectives. T&C opposed to this release as per points 1 and 2 above.

Page 7- T&C outline. T&C opposed to this release as per point 3 above.

Page 8. Issue motivated groups. T&C opposed to this release as per point 3 above.

Page 9. Individuals. Part redacted, T&C opposed to the release of the entire page as per point 3 above.

Page 10. Tactics. T&C opposed to this release as per points 1 &2 above.

Page 11. Photograph. T&C opposed to this release as per point 3 above.

Page 12. Conflict and negotiation. T&C opposed to this release as per points 1 &2 above.

Page 13. Redacted- agreed.

Page 14. Southern Response Media Policy. No objections

Page 15. Southern Response Media Policy. No objections

Page 16. Trespass Act. T&C opposed as per points 1 &2 above.

Page 17 Redacted – Agreed

Page 18 Redacted. Agreed

## **Part 10**

No issues from T&C

## **Part 11**

No issues from T&C.

Victor, I hope this helps to clarify our position, please keep me apprised of the intended OIA response by Southern Response. I would say that once released there will be a challenge to the Ombudsman and I am prepared to meet with the Ombudsmen to discuss and defend our position if necessary.



Kind Regards Gavin

**Gavin Clark**

/ MOBILE

/ PHONE

/ FAX

/ POSTAL

/ WEBSITE

+64 [REDACTED]

+64 9 302 0113

+64 9 361 3260

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RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

15. RE: OIA response

**From:** Victor Wells <xxxxxx.xxxxx@xxxxxxxxxxxxxxxxxx.xx.xx>  
**To:** 'Gavin Clark' <xxxxx.xxxxx@xxxx.xx.xx>  
**Sent Date:** Feb 05, 2016 08:31:24  
**Subject:** RE: OIA response  
**Attachment:** [image001.jpg](#)  
[Part 1 - proposed release info\\_Redacted ver2\\_RedactedWM\\_Part7.pdf](#) 18(d)

---

11 of 11

**Victor Wells**

Legal Risk Manager

**From:** Gavin Clark [mailto:xxxxx.xxxxx@xxxx.xx.xx]  
**Sent:** Thursday, 4 February 2016 11:28 a.m.  
**To:** Victor Wells  
**Subject:** RE: OIA response

Hi Victor

Sorry I haven't been able to open the sharefile doc, have tried a couple of times, I didn't have time to follow this up with [REDACTED] as I have been away for work.

Sorry to delay you but I would really like the opportunity to review it before it is released can you give me until mid next week.

Regards  
Sent from my Sony Xperia™ smartphone

----- Victor Wells wrote -----

Hi Gavin,

Have you had a chance to view the documents making up [REDACTED] response?

16. RE: OIA response

**From:** Victor Wells <xxxxxx.xxxxx@xxxxxxxxxxxxxxxxxx.xx.xx>  
**To:** 'Gavin Clark' <xxxxx.xxxxx@xxxx.xx.xx>  
**Sent Date:** Feb 05, 2016 08:31:15  
**Subject:** RE: OIA response  
**Attachment:** [image001.jpg](#)  
[Part 1 - proposed release info\\_Redacted ver2\\_RedactedWM\\_Part6.pdf](#) 18(d)

---

10 of 11

**Victor Wells**

Legal Risk Manager

**From:** Gavin Clark [mailto:xxxxx.xxxxx@xxxx.xx.xx]  
**Sent:** Thursday, 4 February 2016 11:28 a.m.  
**To:** Victor Wells  
**Subject:** RE: OIA response

Hi Victor

Sorry I haven't been able to open the sharefile doc, have tried a couple of times, I didn't have time to follow this up with [REDACTED] as I have been away for work.

Sorry to delay you but I would really like the opportunity to review it before it is released can you give me until mid next week.

Regards

Sent from my Sony Xperia™ smartphone

----- Victor Wells wrote -----

Hi Gavin,

Have you had a chance to view the documents making up [REDACTED] response?

17. RE: OIA response

**From:** Victor Wells <xxxxxx.xxxxx@xxxxxxxxxxxxxxxxxx.xx.xx>  
**To:** 'Gavin Clark' <xxxxxx.xxxxx@xxxx.xx.xx>  
**Sent Date:** Feb 05, 2016 08:31:01  
**Subject:** RE: OIA response  
**Attachment:** [image001.jpg](#)  
[Part 1 - proposed release info\\_Redacted ver2\\_RedactedWM\\_Part5.pdf](#) 18(d)

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9 of 11

**Victor Wells**

Legal Risk Manager

**From:** Gavin Clark [mailto:xxxxxx.xxxxx@xxxx.xx.xx]  
**Sent:** Thursday, 4 February 2016 11:28 a.m.  
**To:** Victor Wells  
**Subject:** RE: OIA response

Hi Victor

Sorry I haven't been able to open the sharefile doc, have tried a couple of times, I didn't have time to follow this up with [REDACTED] as I have been away for work.

Sorry to delay you but I would really like the opportunity to review it before it is released can you give me until mid next week.

Regards

Sent from my Sony Xperia™ smartphone

---- Victor Wells wrote ----

Hi Gavin,

Have you had a chance to view the documents making up [REDACTED] response?

18. RE: OIA response

**From:** Victor Wells <xxxxxx.xxxxx@xxxxxxxxxxxxxxxxxx.xx.xx>  
**To:** 'Gavin Clark' <xxxxx.xxxxx@xxxx.xx.xx>  
**Sent Date:** Feb 05, 2016 08:30:52  
**Subject:** RE: OIA response  
**Attachment:** [image001.jpg](#)  
[Part 1 - proposed release info\\_Redacted ver2\\_RedactedWM\\_Part4.pdf](#) 18(d)

---

8 of 11

**Victor Wells**

Legal Risk Manager

**From:** Gavin Clark [mailto:xxxxx.xxxxx@xxxx.xx.xx]  
**Sent:** Thursday, 4 February 2016 11:28 a.m.  
**To:** Victor Wells  
**Subject:** RE: OIA response

Hi Victor

Sorry I haven't been able to open the sharefile doc, have tried a couple of times, I didn't have time to follow this up with [REDACTED] as I have been away for work.

Sorry to delay you but I would really like the opportunity to review it before it is released can you give me until mid next week.

Regards

Sent from my Sony Xperia™ smartphone

----- Victor Wells wrote -----

Hi Gavin,

Have you had a chance to view the documents making up [REDACTED] response?

19. RE: OIA response

**From:** Victor Wells <xxxxxx.xxxxx@xxxxxxxxxxxxxxxxxxxx.xx.xx>  
**To:** 'Gavin Clark' <xxxxx.xxxxx@xxxx.xx.xx>  
**Sent Date:** Feb 05, 2016 08:30:42  
**Subject:** RE: OIA response  
**Attachment:** [image001.jpg](#)  
[Part 1 - proposed release info\\_Redacted ver2\\_RedactedWM\\_Part3.pdf](#) 18(d)

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7 of 11

**Victor Wells**

Legal Risk Manager

**From:** Gavin Clark [mailto:xxxxx.xxxxx@xxxx.xx.xx]  
**Sent:** Thursday, 4 February 2016 11:28 a.m.  
**To:** Victor Wells  
**Subject:** RE: OIA response

Hi Victor

Sorry I haven't been able to open the sharefile doc, have tried a couple of times, I didn't have time to follow this up with [REDACTED] as I have been away for work.

Sorry to delay you but I would really like the opportunity to review it before it is released can you give me until mid next week.

Regards

Sent from my Sony Xperia™ smartphone

----- Victor Wells wrote -----

Hi Gavin,

Have you had a chance to view the documents making up [REDACTED] response?

20. RE: OIA response

**From:** Victor Wells <xxxxxx.xxxxx@xxxxxxxxxxxxxxxxxx.xx.xx>  
**To:** 'Gavin Clark' <xxxxx.xxxxx@xxxx.xx.xx>  
**Sent Date:** Feb 05, 2016 08:30:31  
**Subject:** RE: OIA response  
**Attachment:** [image001.jpg](#)  
[Part 1 - proposed release info\\_Redacted ver2\\_RedactedWM\\_Part2.pdf](#) 18(d)

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6 of 11

**Victor Wells**

Legal Risk Manager

**From:** Gavin Clark [mailto:xxxxx.xxxxx@xxxx.xx.xx]  
**Sent:** Thursday, 4 February 2016 11:28 a.m.  
**To:** Victor Wells  
**Subject:** RE: OIA response

Hi Victor

Sorry I haven't been able to open the sharefile doc, have tried a couple of times, I didn't have time to follow this up with [REDACTED] as I have been away for work.

Sorry to delay you but I would really like the opportunity to review it before it is released can you give me until mid next week.

Regards

Sent from my Sony Xperia™ smartphone

----- Victor Wells wrote -----

Hi Gavin,

Have you had a chance to view the documents making up [REDACTED] response?

21. RE: OIA response

**From:** Victor Wells <xxxxxx.xxxxx@xxxxxxxxxxxxxxxxxx.xx.xx>  
**To:** 'Gavin Clark' <xxxxx.xxxxx@xxxx.xx.xx>  
**Sent Date:** Feb 05, 2016 08:30:22  
**Subject:** RE: OIA response  
**Attachment:** [image001.jpg](#)  
[Part 1 - proposed release info\\_Redacted ver2\\_RedactedWM\\_Part1.pdf](#) 18(d)

---

5 of 11

**Victor Wells**

Legal Risk Manager

**From:** Gavin Clark [mailto:xxxxx.xxxxx@xxxx.xx.xx]  
**Sent:** Thursday, 4 February 2016 11:28 a.m.  
**To:** Victor Wells  
**Subject:** RE: OIA response

Hi Victor

Sorry I haven't been able to open the sharefile doc, have tried a couple of times, I didn't have time to follow this up with [REDACTED] as I have been away for work.

Sorry to delay you but I would really like the opportunity to review it before it is released can you give me until mid next week.

Regards

Sent from my Sony Xperia™ smartphone

---- Victor Wells wrote ----

Hi Gavin,

Have you had a chance to view the documents making up [REDACTED] response?



22. RE: OIA response

**From:** Victor Wells <xxxxxx.xxxxx@xxxxxxxxxxxxxxxxxx.xx.xx>  
**To:** 'Gavin Clark' <xxxxx.xxxxx@xxxx.xx.xx>  
**Sent Date:** Feb 05, 2016 08:30:10  
**Subject:** RE: OIA response  
**Attachment:** [image001.jpg](#)  
[Part 1 - proposed release info\\_Part4.pdf](#) 18(d)

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4 of 11

**Victor Wells**

Legal Risk Manager

**From:** Gavin Clark [mailto:xxxxx.xxxxx@xxxx.xx.xx]  
**Sent:** Thursday, 4 February 2016 11:28 a.m.  
**To:** Victor Wells  
**Subject:** RE: OIA response

Hi Victor

Sorry I haven't been able to open the sharefile doc, have tried a couple of times, I didn't have time to follow this up with [REDACTED] as I have been away for work.

Sorry to delay you but I would really like the opportunity to review it before it is released can you give me until mid next week.

Regards

Sent from my Sony Xperia™ smartphone

----- Victor Wells wrote -----

Hi Gavin,

Have you had a chance to view the documents making up [REDACTED] response?

23. RE: OIA response

**From:** Victor Wells <xxxxxx.xxxxx@xxxxxxxxxxxxxxxxxx.xx.xx>  
**To:** 'Gavin Clark' <xxxxx.xxxxx@xxxx.xx.xx>  
**Sent Date:** Feb 05, 2016 08:29:59  
**Subject:** RE: OIA response  
**Attachment:** [image001.jpg](#)  
[Part 1 - proposed release info\\_Part3.pdf](#) 18(d)

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3 of 11

**Victor Wells**

Legal Risk Manager

**From:** Gavin Clark [mailto:xxxxx.xxxxx@xxxx.xx.xx]  
**Sent:** Thursday, 4 February 2016 11:28 a.m.  
**To:** Victor Wells  
**Subject:** RE: OIA response

Hi Victor

Sorry I haven't been able to open the sharefile doc, have tried a couple of times, I didn't have time to follow this up with [REDACTED] as I have been away for work.

Sorry to delay you but I would really like the opportunity to review it before it is released can you give me until mid next week.

Regards

Sent from my Sony Xperia™ smartphone

----- Victor Wells wrote -----

Hi Gavin,

Have you had a chance to view the documents making up [REDACTED] response?

24. RE: OIA response

**From:** Victor Wells <xxxxxx.xxxxx@xxxxxxxxxxxxxxxxxx.xx.xx>  
**To:** 'Gavin Clark' <xxxxxx.xxxxx@xxxx.xx.xx>  
**Sent Date:** Feb 05, 2016 08:29:41  
**Subject:** RE: OIA response  
**Attachment:** [image001.jpg](#)  
[Part 1 - proposed release info\\_Part2.pdf](#) 18(d)

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2 of 11

**Victor Wells**

Legal Risk Manager

**From:** Gavin Clark [mailto:xxxxxx.xxxxx@xxxx.xx.xx]  
**Sent:** Thursday, 4 February 2016 11:28 a.m.  
**To:** Victor Wells  
**Subject:** RE: OIA response

Hi Victor

Sorry I haven't been able to open the sharefile doc, have tried a couple of times, I didn't have time to follow this up with [REDACTED] as I have been away for work.

Sorry to delay you but I would really like the opportunity to review it before it is released can you give me until mid next week.

Regards

Sent from my Sony Xperia™ smartphone

----- Victor Wells wrote -----

Hi Gavin,

Have you had a chance to view the documents making up [REDACTED] response?

25. RE: OIA response

**From:** Victor Wells <xxxxxx.xxxxx@xxxxxxxxxxxxxxxxxx.xx.xx>  
**To:** 'Gavin Clark' <xxxxxx.xxxxx@xxxx.xx.xx>  
**Sent Date:** Feb 05, 2016 08:29:06  
**Subject:** RE: OIA response  
**Attachment:** [image001.jpg](#)  
[Part 1 - proposed release info\\_Part1.pdf](#) 18(d)

---

Hi Gavin,

We have broken up into 11 parts so hopefully these will get through.

1 of 11

**Victor Wells**

Legal Risk Manager

**From:** Gavin Clark [mailto:xxxxxx.xxxxx@xxxx.xx.xx]  
**Sent:** Thursday, 4 February 2016 11:28 a.m.  
**To:** Victor Wells  
**Subject:** RE: OIA response

Hi Victor

Sorry I haven't been able to open the sharefile doc, have tried a couple of times, I didn't have time to follow this up with [REDACTED] as I have been away for work.

Sorry to delay you but I would really like the opportunity to review it before it is released can you give me until mid next week.

Regards

Sent from my Sony Xperia™ smartphone

----- Victor Wells wrote -----

26. RE: OIA response

**From:** Victor Wells <xxxxxx.xxxxx@xxxxxxxxxxxxxxxxxx.xx.xx>  
**To:** 'Gavin Clark' <xxxxxx.xxxxx@xxxx.xx.xx>  
**Sent Date:** Feb 04, 2016 11:32:28  
**Subject:** RE: OIA response  
**Attachment:** [image001.jpg](#)

---

No problem Gavin,

I tried emailing the pdfs but they bounced back. I will break them down into smaller groups and email them this afternoon.

Regards

**Victor Wells**

Legal Risk Manager

**From:** Gavin Clark [mailto:xxxxxx.xxxxx@xxxx.xx.xx]  
**Sent:** Thursday, 4 February 2016 11:28 a.m.  
**To:** Victor Wells  
**Subject:** RE: OIA response

Hi Victor

Sorry I haven't been able to open the sharefile doc, have tried a couple of times, I didn't have time to follow this up with [REDACTED] as I have been away for work.

Sorry to delay you but I would really like the opportunity to review it before it is released can you give me until mid next week.

Regards

Sent from my Sony Xperia™ smartphone

---- Victor Wells wrote ----

27. RE: OIA response

**From:** Victor Wells <xxxxxx.xxxxx@xxxxxxxxxxxxxxxxxx.xx.xx>  
**To:** 'Gavin Clark' <xxxxx.xxxxx@xxxx.xx.xx>  
**Sent Date:** Feb 04, 2016 11:30:16  
**Subject:** RE: OIA response  
**Attachment:** [image001.jpg](#)  
[Part 1 - proposed release info.pdf](#)

---

No problem Gavin,

I will try emailing the documents in four parts.

Regards

**Victor Wells**

Legal Risk Manager

**From:** Gavin Clark [mailto:xxxxx.xxxxx@xxxx.xx.xx]  
**Sent:** Thursday, 4 February 2016 11:28 a.m.  
**To:** Victor Wells  
**Subject:** RE: OIA response

Hi Victor

Sorry I haven't been able to open the sharefile doc, have tried a couple of times, I didn't have time to follow this up with [REDACTED] as I have been away for work.

Sorry to delay you but I would really like the opportunity to review it before it is released can you give me until mid next week.

Regards

Sent from my Sony Xperia™ smartphone

---- Victor Wells wrote ----

28. RE: OIA response

**From:** Victor Wells <xxxxxx.xxxxx@xxxxxxxxxxxxxxxxxx.xx.xx>  
**To:** 'Gavin Clark' <xxxxxx.xxxxx@xxxx.xx.xx>  
**Sent Date:** Feb 04, 2016 10:34:04  
**Subject:** RE: OIA response  
**Attachment:** [image001.jpg](#)

---

Hi Gavin,

Have you had a chance to view the documents making up [REDACTED] response?

Regards

**Victor Wells**

Legal Risk Manager

**From:** Gavin Clark [mailto:xxxxxx.xxxxx@xxxx.xx.xx]  
**Sent:** Wednesday, 27 January 2016 10:19 a.m.  
**To:** Victor Wells  
**Subject:** RE: OIA response

Hi Victor,

Thanks for the email, I'm having some difficulty logging onto file share and am dealing with [REDACTED] on that.

Once I've had a look I will respond to you.

Kind Regards Gavin

**From:** Victor Wells [mailto:xxxxxx.xxxxx@xxxxxxxxxxxxxxxxxx.xx.xx]  
**Sent:** Friday, 22 January 2016 3:20 p.m.

**To:** Gavin Clark

**Subject:** RE: OIA response

Hi Gavin,

Our proposed response in respect of the security information [REDACTED] has requested is attached. The information itself has been uploaded into Sharefile, given the size of the PDFs. Hopefully you will have received notification of the Sharefile upload and I understand that other information has been shared with TC this way? Given the way we have redacted the files, the release is made up in two parts containing a copy of the information and then a copy of the proposed redactions.

A copy of [REDACTED] emails have already been sent to him. The Police are fine with us releasing the information they have been involved with and have already satisfied a request [REDACTED] [REDACTED] made to them.

The information we are proposing to release which you / TC have provided is largely factual information that [REDACTED] has provided to us. There is a little bit of 'profiling' that you have undertaken, particularly at para 59, 61 and 62 which we could potentially withhold, but the profile of "intense and compulsive with a victim mentality" appears the most accurate I have seen. We have generally withheld anything that relates to:

- Your methodology
- Your conclusions/profiling
- Staff security

Let me know if you have any questions, comments or suggestions in respect of our proposed response.

Regards

**Victor Wells**



Legal Risk Manager

**From:** Gavin Clark [mailto:xxxxx.xxxxx@xxxx.xx.xx]  
**Sent:** Wednesday, 21 October 2015 11:01 a.m.  
**To:** Linda Falwasser; Victor Wells  
**Cc:** Nick Thompson  
**Subject:** OIA response

Hi Linda and Victor,

We have been giving it some thought re any OIA requests and have outlined the following points that are core to our proposal of services to Southern Response and good reasons for offering protection on anything that we do for SRES, these are:

1. Southern Response has concerns for the safety of its staff and contractors due to current threats being made against it in relation to acts of violence and intimidation.
2. Southern Response wish to go about its lawful business and are concerned that issue motivated individuals and groups have started to impede on its ability to conduct that work safely whilst still observing a person's right to protest.
3. It is perceived that individuals and or groups will increase their campaign against Southern Response and that the level of threat to staff / contractors / the business may increase and the company recognises its obligations to its staff under health and safety legislation.
4. Although Southern Response is handling over 1.6 billion dollars' worth of claims it understands that a vocal minority of issue motivated individuals have the ability to impact on the organisations reputation

We have examples that other clients have used successfully to withhold information and I will bring these with me tomorrow to discuss with you.

I have training sessions booked and can be available tomorrow from 3pm if you would like to schedule a meeting.

Kind Regards

**Gavin Clark**

/ MOBILE

/ PHONE

/ FAX

/ POSTAL

/ WEBSITE

+64 [REDACTED]

+64 9 302 0113

+64 9 361 3260

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Southern Response cannot guarantee this message or attachment(s) are free from computer viruses or other defects

and will not accept liability for any loss, damage or consequence resulting directly and/or indirectly from their use.

29. RE: OIA response

**From:** Victor Wells <xxxxxx.xxxxx@xxxxxxxxxxxxxxxxxx.xx.xx>  
**To:** 'Gavin Clark' <xxxxxx.xxxxx@xxxx.xx.xx>  
**Sent Date:** Jan 28, 2016 08:48:15  
**Subject:** RE: OIA response  
**Attachment:** [image001.jpg](#)

---

Thanks Gavin,

We have had a final response from our lawyers who are comfortable with what we are releasing. When we hear back from you we will send the information out.

Regards

**Victor Wells**

Legal Risk Manager

**From:** Gavin Clark [mailto:xxxxxx.xxxxx@xxxx.xx.xx]  
**Sent:** Wednesday, 27 January 2016 10:19 a.m.  
**To:** Victor Wells  
**Subject:** RE: OIA response

Hi Victor,

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**From:** Victor Wells [mailto:xxxxxx.xxxxx@xxxxxxxxxxxxxxxxxx.xx.xx]  
**Sent:** Friday, 22 January 2016 3:20 p.m.  
**To:** Gavin Clark  
**Subject:** RE: OIA response

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The information we are proposing to release which you / TC have provided is largely factual information that [REDACTED] has provided to us. There is a little bit of 'profiling' that you have undertaken, particularly at para 59, 61 and 62 which we could potentially withhold, but the profile of "intense and compulsive with a victim mentality" appears the most accurate I have seen. We have generally withheld anything that relates to:

- Your methodology
- Your conclusions/profiling
- Staff security

Let me know if you have any questions, comments or suggestions in respect of our proposed response.

Regards

**Victor Wells**

Legal Risk Manager

**From:** Gavin Clark [mailto:xxxxx.xxxxx@xxxx.xx.xx]  
**Sent:** Wednesday, 21 October 2015 11:01 a.m.  
**To:** Linda Falwasser; Victor Wells  
**Cc:** Nick Thompson  
**Subject:** OIA response

Hi Linda and Victor,

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2. Southern Response wish to go about its lawful business and are concerned that issue motivated individuals and groups have started to impede on its ability to conduct that work safely whilst still observing a person's right to protest.
3. It is perceived that individuals and or groups will increase their campaign against Southern Response and that the level of threat to staff / contractors / the business may increase and the company recognises its obligations to its staff under health and safety legislation.
4. Although Southern Response is handling over 1.6 billion dollars' worth of claims it understands that a vocal minority of issue motivated individuals have the ability to impact on the organisations reputation

We have examples that other clients have used successfully to withhold information and I will bring these with me tomorrow to discuss with you.

I have training sessions booked and can be available tomorrow from 3pm if you would like to schedule a meeting.

Kind Regards

**Gavin Clark**

/ MOBILE

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/ WEBSITE

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+64 9 361 3260

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30. RE: OIA response

**From:** Victor Wells <xxxxxx.xxxxx@xxxxxxxxxxxxxxxxxx.xx.xx>  
**To:** 'Gavin Clark' <xxxxx.xxxxx@xxxx.xx.xx>  
**Sent Date:** Jan 22, 2016 15:20:13  
**Subject:** RE: OIA response  
**Attachment:** [image001.jpg](#)  
[ltr - OIA - \[REDACTED\] - Security Request.docx](#) 9(2)(a)

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Hi Gavin,

Our proposed response in respect of the security information [REDACTED] has requested is attached. The information itself has been uploaded into Sharefile, given the size of the PDFs. Hopefully you will have received notification of the Sharefile upload and I understand that other information has been shared with TC this way? Given the way we have redacted the files, the release is made up in two parts containing a copy of the information and then a copy of the proposed redactions.

A copy of [REDACTED] emails have already been sent to him. The Police are fine with us releasing the information they have been involved with and have already satisfied a request [REDACTED] made to them.

The information we are proposing to release which you / TC have provided is largely factual information that [REDACTED] has provided to us. There is a little bit of 'profiling' that you have undertaken, particularly at para 59, 61 and 62 which we could potentially withhold, but the profile of "intense and compulsive with a victim mentality" appears the most accurate I have seen. We have generally withheld anything that relates to:

- Your methodology
- Your conclusions/profiling
- Staff security

Let me know if you have any questions, comments or suggestions in respect of our proposed response.

31. RE: OIA response

**From:** Victor Wells <xxxxxx.xxxxx@xxxxxxxxxxxxxxxxxx.xx.xx>  
**To:** 'Gavin Clark' <xxxxxx.xxxxx@xxxx.xx.xx>  
**Sent Date:** Oct 22, 2015 09:23:24  
**Subject:** RE: OIA response  
**Attachment:** [image001.jpg](#)

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Thanks Gavin,

I have a meeting from 3 – 4 but otherwise would be keen to have a quick catch up while you are here?

**Victor Wells**

Legal Risk Manager

**From:** Gavin Clark [mailto:xxxxx.xxxxx@xxxx.xx.xx]  
**Sent:** Wednesday, 21 October 2015 11:01 a.m.  
**To:** Linda Falwasser; Victor Wells  
**Cc:** Nick Thompson  
**Subject:** OIA response

Hi Linda and Victor,

We have been giving it some thought re any OIA requests and have outlined the following points that are core to our proposal of services to Southern Response and good reasons for offering protection on anything that we do for SRES, these are:

1. Southern Response has concerns for the safety of its staff and contractors due to current threats being made against it in relation to acts of violence and intimidation.
2. Southern Response wish to go about its lawful business and are concerned that issue motivated individuals and groups have started to impede on its ability to conduct that work safely whilst still observing a person's right to protest.
3. It is perceived that individuals and or groups will increase their campaign against Southern Response and that the level of threat to staff / contractors / the business may increase and the company recognises its obligations to its staff under health and safety legislation.



32. FW: OIA Request

**From:** Linda Falwasser <xxxxx.xxxxxxxxxx@xxxxxxxxxxxxxxxxxx.xx.xx>  
**To:** Gavin Clark <xxxxx.xxxxx@xxxx.xx.xx>  
**Sent Date:** Oct 21, 2015 08:02:56  
**Subject:** FW: OIA Request  
**Attachment:**

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-----Original Message-----

**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** Thursday, 24 September 2015 5:01 p.m.  
**To:** Victor Wells; OIA Requests  
**Subject:** OIA Request  
**Importance:** High

Hi Victor,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I look forward to your written acknowledgement of this request.

Kind Regards,

[REDACTED]

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33. FW: Transfer of OIA from NZ Police

**From:** Linda Falwasser <xxxxx.xxxxxxxxx@xxxxxxxxxxxxxxxxxx.xx>  
**To:** Gavin Clark <xxxxx.xxxxx@xxxx.xx.xx>  
**Sent Date:** Oct 21, 2015 08:02:42  
**Subject:** FW: Transfer of OIA from NZ Police  
**Attachment:**

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-----Original Message-----

**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** Monday, 19 October 2015 9:08 a.m.  
**To:** Victor Wells; OIA Requests  
**Subject:** Transfer of OIA from NZ Police

Dear Southern Response.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

We look forward to the information as requested.

Kind Regards,

[REDACTED]

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