THE HON JOSH FRYDENBERG MP
TREASURER

Ref: MS20-002739

Senator the Hon Concetta Fierravanti-Wells
Chair
Senate Standing Committee for the Scrutiny of Delegated Legislation
Parliament House
CANBERRA ACT 2600

Via email: sdlc.sen@aph.gov.au

Dear Senator Fierravanti-Wells

Thank you for your letter dated 3 December 2020, on behalf of the Senate Standing Committee for the Scrutiny of Delegated Legislation (the Committee), requesting advice in relation to the *ASIC Corporations (Stub Equity in Control Transactions) Instrument 2020/734* [F2020L01199] (the Instrument).

The Committee requested advice as to whether the Instrument could be amended to specify that it ceases to apply three years after the date the Instrument commences.

Background

The modifications under s655A and s741 of the *Corporations Act 2001* (Act) were made after an increase in the number of 'stub equity' control transactions was identified, in which:

- the consideration offered to holders, including retail investors, includes securities in a proprietary company; and
- the securities are offered on terms which require certain accepting holders (e.g. all retail investors, or all existing holders of the target other than specified institutions) to have those securities registered in the name of a custodian, rather than holding the securities directly.

Ordinarily, proprietary companies must have no more than 50 non-employee shareholders and are prohibited from activities which would require disclosure to investors under Chapter 6D of the Act. Accordingly, structuring control transactions (through the use of custodial arrangements) to keep the number of holders on the issuer's register artificially below 50 negatively impacts retail investors, who accept scrip consideration. They are deprived of the disclosure and governance protections that they would otherwise be entitled to if the issuer was required to convert to a public company due to the number of beneficial holders of its securities.

The purpose of the Instrument is to create a regulatory environment where retail investors in, what are in substance, widely-held companies, are entitled to the levels of investor protection available in public companies.

Expiry of the Instrument

The transaction structures observed may continue to be utilised in the absence of the modifications in the Instrument and may continue to deprive retail investors of the rights and protections that might otherwise be available to them. Further, in the interests of ongoing longer-term regulatory certainty for companies who may be impacted by the Instrument, it is appropriate for the Instrument to apply for as long as possible.

That said, the Government shares the Committee's concerns that there be sufficient Parliamentary oversight. We will continue to engage with ASIC to stress that the period of operation of instruments made by them should be consistent not only with the policy intent of the underlying primary legislation and the need to minimise any regulatory burden imposed on individuals or entities, but also importantly with the need for Parliamentary oversight of instruments that modify the operation of the primary legislation.

We will continue to engage with ASIC as it monitors stub equity transactions and, to the extent that the Instrument does not operate as intended, results in unintended outcomes, or is no longer needed, amends or withdraws the Instrument in advance of the sunset date.

I trust this information will be of assistance to the Committee.

Yours sincerely,

THE HON JOSH FRYDENBERG MP

06/12th/2020

THE HON JOSH FRYDENBERG MP
TREASURER

Ref: MS20-002573

Senator the Hon Concetta Fierravanti-Wells
Chair
Senate Standing Committee for the Scrutiny of Delegated Legislation
Parliament House
CANBERRA ACT 2600

Dear Senator Fierravanti-Wells

Thank you for your letter on behalf of the Senate Standing Committee for the Scrutiny of Delegated Legislation (the Committee) regarding the *Australian Prudential Regulation Authority (confidentiality) determination No. 1 of 2020* (the Instrument).

In that letter, the Committee sought my advice as to whether prior to making the Instrument, the Australian Prudential Regulation Authority (APRA), who made the Instrument, gave all parties interested in the Instrument a reasonable opportunity to make representations in relation to whether or not the relevant reporting documents contain confidential information, noting the requirements in subsection 57(3) of the *Australian Prudential Regulation Authority Act 1998*. APRA was consulted in the drafting of this response.

As you may be aware, the Instrument determines that certain information provided to APRA under specified reporting standards by general insurers and Lloyd's underwriters (Lloyds) for the purposes of the National Claims and Policies Database (NCPD) is not confidential. Since 2010, APRA has made this determination annually.

APRA is of the view that interested parties have, and continue to have, a reasonable opportunity to make representations as to whether or not the relevant reporting documents contain confidential information.

This view has been effectively sustained since 2010. As outlined in the Instrument's Explanatory Statement, APRA conducted extensive consultation with general insurers and Lloyds in 2008 and 2009 for the purposes of determining information provided by them to be non-confidential for the purposes of the *Australian Prudential Regulation Authority (confidentiality) determination No. 10 of 2010*. Since then, the scope of the information used for NCPD has remained static.[1] This is consistent with the Instrument which provides the same limited scope of financial information, reported by general insurers and Lloyds every six months, as being treated as non-confidential information.

[1] For the information of the Committee, APRA is currently consulting on a proposal to collect and publish cyber insurance and management liability data within the NCPD collection. https://www.apra.gov.au/consultation-on-collection-of-cyber-insurance-and-management-liability-data-national-claims-and-0

The NCPD statistical publication was launched in 2003, and APRA has been publishing insurance policy and claims data since 2005. The publication is deeply established in industry practice and has been relied upon by general insurers and Lloyds and the wider insurance industry to inform their activities since the early 2000s.

APRA confirms that the reporting requirements under the relevant reporting documents to the Instrument have also not changed since 2008. The relevant reporting documents to this Instrument are the Reporting Standards GRS 800.1, GRS 800.2, GRS 800.3, LOLRS 800.1, LOLRS 800.2 and LOLRS 800.3. These Reporting Standards have been the basis of the NCPD since 2005. As provided by the combined Explanatory Statement to the current versions of these Reporting Standards,[2] the information collected by these Reporting Standards remained consistent since 2006.

Since the 2010 consultation, APRA has not received feedback from a general insurer or Lloyds expressing concern about the financial information being determined as non-confidential. In addition to this, APRA has not received feedback from any industry associations that the financial information of their general insurer participants should not be determined as non-confidential.

For the small number of new entrants to the general insurer reporting population since the 2010 consultation, APRA have advised that these general insurers are informed during their authorisation process that they will be required to report their financial information, and that certain segments of that information may be included in a non-confidential determination by APRA. The new entrants are also advised that the purpose behind APRA's non-confidential determination is to publish the data for the purpose of informing the wider insurance industry. Therefore, APRA have advised that the authorisation process provides general insurers, who were authorised after the 2010 consultation, with a reasonable opportunity to make representations as to whether or not the relevant reporting documents contain confidential information.

Given the long-standing history of the NCPD, APRA have advised that it is well-understood in the industry that the relevant information identified in the Instrument will form part of the NCPD statistical publication. APRA considers that all general insurers and Lloyds continue to have an opportunity to make representations about the confidentiality of their financial information at all times, either when submitting the financial information to APRA or prior to the regular release of the NCPD statistical publication.

Given the above explanation, APRA has advised that they are satisfied that all interested parties were given a reasonable opportunity to make representations regarding the confidentiality of the information. APRA has also expressed that it would be willing to include additional information in the Explanatory Statement addressing the Committee's concerns.

Thank you for bringing your concerns to my attention.

Yours sincerely

THE HON JOSH FRYDENBERG MP

/2020

[2] Please see: https://www.legislation.gov.au/Details/F2016L01411/Explanatory%20Statement/Text.

Senator the Hon Simon Birmingham

Minister for Finance
Leader of the Government in the Senate
Senator for South Australia

REF: MS20-001192

Senator the Hon Concetta Fierravanti-Wells
Chair
Senate Standing Committee for the
Scrutiny of Delegated Legislation
Parliament House
CANBERRA ACT 2600

Dear Senator Fierravanti-Wells

I refer to your letter dated 12 November 2020 seeking further information about the *Financial Framework (Supplementary Powers) Amendment (Home Affairs Measures No. 4) Regulations 2020*.

The Minister for Agriculture, Drought and Emergency Management, the Hon David Littleproud MP, who is responsible for the 'Coronavirus economic response – pandemic leave disaster payments' item in this instrument, has provided the attached response to the Committee's request for further information.

As requested by the responsible Minister, I have also agreed to amend item 434 in Part 4 of Schedule 1AB to the *Financial Framework (Supplementary Powers) Regulations 1997* to address the Committee's concerns in relation to setting out eligibility criteria for the payments in the item.

The proposed amendments will be brought forward for the Governor-General's consideration at one of the Federal Executive Council meetings early in 2021. The explanatory statement to the amendment instrument will also provide greater detail in relation to consultation, as requested by the Committee.

Adelaide
107 Sir Donald Bradman Drive, Hilton SA 5033
Ph 08 8354 1644

Canberra
Parliament House Canberra ACT 2600
Ph 02 6277 7400

I trust this advice will assist the Committee with its consideration of the instrument.

I have copied this letter to the Minister for Agriculture, Drought and Emergency Management.

Thank you for bringing the Committee's comments to the Government's attention.

Yours sincerely

Simon Birmingham

(December 2020

Attachment

***Financial Framework (Supplementary Powers) Amendment (Home Affairs Measures No. 4) Regulations 2020* [F2020L00994]**

Response provided by the Minister for Agriculture, Drought and Emergency Management

How long it is envisaged that the pandemic leave disaster payment program is likely to remain open for new claims?

The Australian Government does not propose to nominate an end date for the Pandemic Leave Disaster Payment (the Payment) at this stage, given the ongoing uncertainty with COVID-19, in particular given outbreaks can occur at any stage (as we saw recently in South Australia).

The Payment plays an important role in encouraging workers to quarantine by preventing and mitigating the financial hardship associated with being unable to attend work. The response to the outbreaks in Victoria and South Australia has demonstrated the benefits of getting close contacts into quarantine quickly. The Payment encourages people to quarantine, because they know they will be financially supported while they are not working.

Having the Payment readily available when it is required is vital to preventing the spread of the virus in workplaces, and the community more broadly, and makes it a key element of the national health response. As such, the Payment is intended to operate while the risk of workplace and community transmission continues in Australia.

Furthermore, a review of the ongoing need for the Payment will be undertaken by the end of March 2021 taking into account medical advice and the health response. The review will explore options for introducing the Payment into primary legislation while considering the broader context of the overall suite of disaster support payments. It would be preferable that the Payment remain available as a grant program authorised through Item 434 in Part 4 of Schedule 1AB to the *Financial Framework (Supplementary Powers) Regulations 1997* (Item 434) while primary legislation is considered to provide critical financial support and promote compliance with health directions, in the event of localised community transmission. If the review determines that the program is no longer required due to extended periods of low community transmission or the availability of a vaccine, Item 434 will be repealed.

The appropriateness of establishing at least the broad scope of the program in primary legislation, noting that parliamentary sittings have recommenced and that similar payments have appropriately been established in primary legislation?

As part of the review, the Australian Government will consider the appropriateness of introducing primary legislation that provides for the Payment, taking into account the broader context of the overall suite of disaster support payments.

Whether, at a minimum, the scope and details of the program could be set out in a disallowable legislative instrument, rather than in the grants opportunity guidelines, to provide at least some level of parliamentary oversight of important aspects of the program such as eligibility criteria for the payment.

I have requested that the Minister for Finance amend Item 434 at a Federal Executive Council meeting in early 2021. Item 434 will be amended to include additional details on the eligibility criteria for the Payment, including that a person is 17 years or over, is an Australian citizen or resident or the holder of a visa class that allows for work in Australia, that the person is unable to attend work or earn an income as a result of directed isolation or quarantine requirements, that the person does not have appropriate leave entitlements, and that the person must not be receiving an income support payment or JobKeeper Payment.

Similarly, I have asked the Minister for Finance to amend the Explanatory Statement to directly refer to the comprehensive information on the Payment available in the Grant Guidelines.

Request advice as to whether independent merits review can be made available for decisions made in relation to the administration of the pandemic leave disaster payment program.

If primary legislation is pursued, the Australian Government will also consider the appropriateness of the Payment being subject to independent merits review by the Administrative Appeals Tribunal (AAT).

The Government notes the Committee's view that the decision making process is not strictly automatic and may require the decision maker to exercise minor discretion. However, the Payment is being administered in a beneficial way to promote compliance with health objectives and ensure financial support is available. Self-declaration is the primary method of a person demonstrating they have met the eligibility criteria. For example, a person must make a self-declaration that they have exhausted any leave entitlements.

Furthermore, where there are elements of doubt about qualification for the Payment or special circumstances unique to an individual, there is a long standing process whereby Services Australia can seek policy clarification from the Department of Home Affairs (Home Affairs).

Given these are beneficial and not complex decisions, the internal review process conducted by Services Australia provides an effective means of efficiently arriving at the preferable decision. In the case of a rejected claim, details on the review process within Services Australia are described in the letter to the claimant. Claimants can request that a Services Australia Subject Matter Expert (SME) review a claim decision in the first instance. If claimants disagree with the outcome of the SME review, they can request a further review by a Services Australia Authorised Review Officer. Services Australia may seek input from Home Affairs at any point in this process prior to finalising the review. The internal review process in Services Australia provides a robust means of addressing errors or discretion that might occur in the decision making process.

As set out in the grant guidelines, the Payment is subject to Home Affairs' complaints process and oversight by the Commonwealth Ombudsman.

Request advice as to whether the explanatory statement to the instrument could be amended to provide greater detail as to why only limited consultation was undertaken in relation to the development of this specific instrument.

I have asked the Minister for Finance to amend the Explanatory Statement to Item 434 to provide greater detail on the reasons why limited consultation was undertaken.

THE HON JOSH FRYDENBERG MP
TREASURER

Ref: MS20-002736

Senator the Hon Concetta Fierravanti-Wells
Chair
Senate Standing Committee for the Scrutiny of Delegated Legislation
Parliament House
CANBERRA ACT 2600

Via email: sdlc.sen@aph.gov.au

Dear Senator Fierravanti-Wells

Thank you for your letter dated 3 December 2020, on behalf of the Senate Standing Committee for the Scrutiny of Delegated Legislation (the Committee), requesting advice in relation to the *Financial Sector Reform (Hayne Royal Commission Response – Protecting Consumers) (Mortgage Brokers) Regulations 2020* [F2020L01189].

The Committee requested advice as to why it was considered necessary and appropriate to prescribe key elements of the definition of conflicted remuneration in delegated, rather than primary, legislation.

The use of delegated legislation is justified in recognition of the need to account for the variety of and complexity of benefits that may be given to mortgage brokers and mortgage aggregators in relation to credit assistance, and the variety of situations in which such payments may be given.

In these circumstances, the use of delegated legislation allows for the regime to respond to changes in industry practice and to ensure that the new regime operates for the benefit of consumers.

I also note that, in dealing with the circumstances in which a benefit will or will not be conflicted remuneration, as well as the circumstances in which conflicted remuneration is banned, the regulations only have applicability in relation to a limited class of persons. Specifically, they will only have effect in relation to the giving of benefits to, or the acceptance of benefits by, mortgage brokers and mortgage intermediaries and their representatives.

Given the limited class of persons in relation to which the ban on conflicted remuneration applies, it is appropriate that the detail of these matters is dealt with in regulations, rather than in the primary law.

If these matters were to be inserted into the *National Consumer Credit Protection Act 2009,* they would insert, into an already complex statutory framework, a set of technical and specific

Parliament House Canberra ACT 2600 Australia
Telephone: 61 2 6277 7340 | Facsimile: 61 2 6273 3420

provisions that would apply only to a relatively small group of persons. This would result in additional cost and unnecessary complexity for other users of that act.

I trust this information will be of assistance to the Committee.

Yours sincerely,

THE HON JOSH FRYDENBERG MP
17 / 12 / 2020

Senator the Hon Anne Ruston

Minister for Families and Social Services
Senator for South Australia
Manager of Government Business in the Senate

Ref: MC20-018265

Senator the Hon Concetta Fierravanti-Wells
Chair
Senate Standing Committee for the Scrutiny of Delegated Legislation
Parliament House
CANBERRA ACT 2600

Dear Senator Fierravanti-Wells

Thank you for your letter of 3 December 2020 on behalf of the Senate Standing Committee for the Scrutiny of Delegated Legislation, requesting advice on a number of matters regarding five Income Management instruments made on 25 September 2020.

The Committee has requested advice on why the matters set out under these instruments were made by primary legislation. The use of delegated legislation is appropriate in this instance, as these instruments give the flexibility to administer the delivery of Income Management under the social security law as efficiently as possible.

Following passage of the Social Security (Administration) Amendment (Continuation of Cashless Welfare) Bill 2020 on 10 December 2020, Income Management participants in the Northern Territory can choose to transition from Income Management to the Cashless Debit Card (CDC).

As four of the five Income Management instruments relate to Income Management in the Northern Territory, the number of people affected by these instruments will reduce once the transition onto the CDC commences in the Northern Territory. CDC is highly prescriptive under Part 3D of the *Social Security (Administration) Act 1999* (the Administration Act) in relation to participant criteria, program locations and the other matters that Income Management participants are subject to under the Income Management instruments. While the fifth instrument relates to arrangements for the broader Income Management volunteer population (the *Social Security (Administration) (Deductible portion — section 123XPA) Specification 2020)*, the vast majority of these volunteers reside in the Northern Territory and will also be given an option to transition to the CDC.

During the transition, the instruments are crucial to minimising disruption to vulnerable welfare recipients and voluntary Income Management participants. The instruments will continue to apply if some participants do not elect to transition.

Prior to the CDC legislated sunset date of 31 December 2022, the Australian Government will review the Income Management provisions to consider whether changes are required to the legislation, including assessing whether matters covered in delegated legislation should be incorporated in the Administration Act.

The Committee has also requested advice on consultation undertaken. My department consulted with the Northern Territory Government, Services Australia and the National Indigenous Australians Agency on the instruments and through this consultation, it was determined that the instruments were operating effectively.

The department currently holds a number of forums with Services Australia, the National Indigenous Australians Agency and other agencies that can provide feedback from staff who regularly engage with Income Management participants and stakeholders in areas that Income Management operates. These forums ensure that any issues with existing or future policy can be raised and any necessary action can be identified and implemented with a whole of government focus.

In addition to the regular forums, the department has undertaken an extensive engagement process in the Northern Territory and Cape York with Income Management participants. As outlined in the explanatory statements to the instruments, my department engaged extensively with communities and stakeholders in the Northern Territory in 2019 and 2020, on the proposed transition from Income Management to the CDC. This included 74 community visits and 92 meetings with stakeholders and local organisations. As part of this engagement, my department discussed current Income Management policy settings with community members and stakeholders.

Additionally, the department consulted with Services Australia and the National Indigenous Australians Agency on draft versions of all five instruments, as well as Northern Territory Government Territory Families in relation to the *Social Security (Administration) (Declared child protection State or Territory – Northern Territory) Determination 2020* and *Social Security (Administration) (Declared voluntary income management area – Northern Territory) Determination 2020*. No concerns were raised with existing policy as reflected in the draft instruments.

In relation to concerns raised by the Committee regarding the Secretary's powers under the *Social Security (Administration) (Exempt Welfare Payment Recipients – Principal Carers of a Child) (Indications of Financial Vulnerability) Principles 2020*, subsection 123UGD(5) of the Administration Act requires the Secretary to comply with any decision-making principles set out in a legislative instrument made by the relevant Minister. This instrument currently applies for exemption requests from Northern Territory Income Management participants.

Considering the complex nature of financial vulnerability, the instrument provides the Secretary with flexibility to consider a person's individual circumstances when making a determination to exempt a person from Income Management. Consultation with stakeholders identified that the current instrument was operating effectively, but subsection 123UGD(5) enables further instruments to be made if it is identified that current arrangements are not effective.

This instrument will not apply to Income Management participants who choose to transition to the CDC in the Northern Territory. In those circumstances, CDC participants will have access to the exit and exemption provisions under Part 3D of the Administration Act.

I trust this information addresses the concerns raised by the Committee.

Yours sincerely

Anne Ruston

18/12/2020

THE HON PETER DUTTON MP
MINISTER FOR HOME AFFAIRS

Ref No: MS20-002942

Senator the Hon Concetta Fierravanti-Wells
Chair
Senate Standing Committee for the
Scrutiny of Delegated Legislation
Parliament House
Canberra ACT 2600

Dear ~~Chair~~ Connie,

I refer to your letter of 12 November 2020 seeking my advice on the *Telecommunications (Interception and Access) (Communications Access Co-ordinator Instrument 2019* [F2020L01141] (CAC Instrument).

Please see below my responses to the Committee's questions.

First Question

What functions and powers will be, or have been, performed or exercised by individuals specified as a Communications Access Co-ordinator (CAC) under section 5 of the instrument?

The functions of the Communications Access Co-ordinator (CAC) transferred from the Attorney-General's Department to the Department of Home Affairs (the Department) in May 2018. Since then, the functions of the CAC have been carried out by the same two areas of the Department, namely, the Office of the Communications Access Coordinator (OCAC) within the National Security Policy Branch and the Critical Infrastructure Centre (CIC) within the Telecommunications and Technology Branch.

National Security Policy Branch

Functions exercised by a CAC within OCAC relate to the following decisions:

- interception capability obligations (see sections 192, 196, 197, 198, 202 and 203) under the *Telecommunications (Interception and Access) Act 1979* (TIA Act)
- data retention obligations (see sections 183 and 187) under the TIA Act
- carrier licence applications (see sections 56 and 58) under the *Telecommunication Act 1997* (Telco Act)

The CAC powers exercised by OCAC generally relate to high-volume decisions. These include approving interception capability plans, exemptions or variations from data retention obligations and consulting law enforcement and national security agencies on carrier licence applications.

OCAC consults interception agencies (primarily ASIO) on all decisions and relies on their technological expertise and knowledge of the law enforcement/national security space to inform CAC decisions.

Complex or sensitive decisions, such as those involving decisions to delay the issue of a carrier licence, are referred to an SES Band 1 decision-maker to ensure decisions that are detrimental to an applicant have additional oversight.

All decisions are managed through the Department's 'Customer Relationship Manager' system and recorded in TRIM.

Telecommunications and Technology Branch

Functions exercised by the CAC within the CIC relate to the following decisions:

- notification obligations (see section 314A) under the Telco Act

The notification is reviewed internally by a technical Subject Matter Expert (SME) with expertise and experience in cybersecurity and risk management, in close consultation with security agencies. The SME then documents an overall technical threat assessment based on a combination of the security agency input and his/her own evaluation before drafting advice to the CAC for approval. The draft advice is reviewed by the EL1 & EL2, before it is progressed to the Communications Access Co-Ordinator (SES Band 1) for review and approval.

Second Question

What qualifications and expertise individuals specified as a Communications Access Co-ordinator under section 5 of the instrument are required to possess?

There is significant on-the-job training, mentoring and policy guidance in order to ensure all CACs are appropriately qualified to perform the functions and make decisions relevant to CAC-related tasks assigned administratively to their classification level. In assigning CAC-related functions to particular classification levels, based on the CAC instrument, the Department has had regard to the Australian Public Service Commission's APS Work level standards, and Integrated Leadership System. In addition, sections 25 to 29 of the *Public Governance, Performance and Accountability Act 2013* (PGPA Act) set out the general duties that apply to officials that requires all officials to meet high standards of governance, performance and accountability.

In order to support CACs in carrying out their functions, both the National Security Policy Branch and the Telecommunications and Technology Branch have guides and standard operating procedures in place detailing the processes required for making CAC decisions.

Third Question

What functions and powers individuals specified as a Communications Access Co-ordinator under section 5 of the instrument may further subdelegate (if any)?

Under the TIA Act, a CAC is defined as the Secretary of the Department of Home Affairs or a person or body specified by the Minister in a legislative instrument to be a CAC. There is no power for either the Secretary or a person specified by the Minister to further delegate their powers or functions.

Fourth Question

Why the registration of the instrument was delayed by approximately 14 months?

The vast majority of delegation and authorisation instruments prepared and finalised in the Department are administrative instruments, and do not require registration on the Federal Register of Legislation (FRL). The CAC Instrument was prepared, signed by the Minister, and returned to the Department as part of a package of delegation and authorisation instruments required to give effect to major structural changes in the Department at that time. Unfortunately, when the instruments were returned to the Department, the unique nature of the CAC Instrument as a legislative instrument, and the need for it to be registered on the FRL, was overlooked by the area receiving the signed instruments. The failure to register the CAC Instrument did not become apparent until June 2020 when drafting was underway on the 2020 Amendment Instrument, resultant from further restructuring.

Measures are now in place to ensure that, in the future, officers responsible for preparing and finalising delegation and authorisation instruments are aware that the CAC authorisation instrument is a legislative instrument, that the Minister must approve an Explanatory Statement for it, and both documents must be registered on the FRL.

Fifth Question

Whether each individual who performed the functions or exercised the powers as a Communications Access Co-ordinator in the period between 1 July 2019 and 7 September 2020 were authorised to do so under the 2018 instrument?

All individuals who exercised powers or functions as a CAC during this period were authorised to do so by the 2018 Instrument. All such individuals carried out CAC functions in Branches of the Department named in the 2018 instrument. The names of those two Branches have not changed since 2018.

Yours sincerely

02/12/20

PETER DUTTON