



Australian Government

Office of the Australian Information Commissioner

Professor Rebekah Brown FASSA

Interim Vice-Chancellor & President

Australian National University

By email: vc@anu.edu.au

Copied to: foi@anu.edu.au

Dear Professor Brown

Significant Increase in FOI Requests Received by ANU in 2025

Thank you for your letter of 25 November 2025, in which you advised of the significant and sustained increase in the number and complexity of FOI requests received by the Australian National University (the University).

I acknowledge your advice about the challenges this has presented to the University in complying with statutory timeframes, and I appreciate the proactive and considered strategies being implemented by the University, as part of its FOI Action Plan, to improve its information access operations in line with OAIC guidance.

To assist the University in identifying other strategies to support this capability uplift, the University may also wish to consider:

- recommendations issued in response to recent FOI complaint investigations undertaken into agency timeliness, as published on our [website](#), and
- completing the OAIC's [Self-assessment tool for agencies](#), to assist the University to identify FOI compliance areas where attention is needed, as well as areas where it is doing well.

As part of the Office of the Australian Information Commissioner's (OAIC) ongoing monitoring of agency performance, including through our review of the University's quarterly FOI statistics, we may reach out to request further information from the University.

I would also appreciate receiving an update from the University on the progress and outcomes achieved under its FOI Action Plan, including its performance against statutory timeframes, by **15 June 2026**.

If you would like to discuss this matter, please contact me on **s.47F Personal privacy**
s.47F Personal privacy If your staff would like to discuss this matter, they may
contact **s.47F Personal privacy**

s.47F Personal privacy

Yours sincerely

s.47F Personal privacy

Alice Linacre
Freedom of Information Commissioner

16 December 2025



Australian
National
University

Professor Rebekah Brown FASSA
Interim Vice-Chancellor & President
Office of the Interim Vice-Chancellor
vc@anu.edu.au

25 November 2025

Ms. Alice Linacre PSM
Australian Freedom of Information Commissioner
Office of the Australian Information Commissioner

Re: Significant Increase in FOI Requests Received by ANU in 2025

Dear Commissioner,

I am writing to advise the Office of the Australian Information Commissioner (OAIC) of a significant and sustained increase in the number of Freedom of Information (FOI) requests received by the Australian National University (the University). This increase has placed considerable pressure on processing capacity and is impacting the University's ability to consistently meet statutory timeframes under the FOI Act, which the University continues to strive to achieve.

FOI Request Trends

The volume of FOI requests has grown substantially over the past three years, with the most pronounced escalation occurring this year.

In 2022, the total number of FOI requests received was 77. Since then, the University has recorded a 194% increase in FOI requests. Across the whole of 2024, the University received a record 164 requests. As of 23 October 2025, the University has already received 227 requests, surpassing previous annual totals.

In addition, the number of Internal Reviews requested has also increased by 100%. The University received a total of five requests for Internal Reviews in both 2022 and 2023. Across the whole of 2024, eight Internal Reviews were received. As of 23 October 2024, the University has already received 12 requests for internal review.

Alongside the higher volume of FOI requests, the University is facing increased complexity, scope and size in the nature of submissions. Many requests now span multiple Colleges and Service Divisions, involve large datasets, or require detailed contextual analysis, significantly extending the time needed for processing. This trend has compounded existing resourcing pressures and made it more difficult to meet statutory deadlines. The University is responding by reviewing workflows, enhancing coordination across units, and exploring process improvements to manage the growing demands effectively.

Despite the fact many requests are coming from a small number of individuals, the University has deliberately avoided burdening the Information Commissioner with unnecessary or vexatious applications, maintaining a responsible and measured approach to regulatory engagement. This reflects a commitment to resolving matters internally where appropriate and upholding the integrity of the FOI process.

A detailed breakdown of FOI request data is provided in the FOI Action plan (**Attachment 1**).

FOI Action Plan

As the Principal Officer under the FOI Act, I acknowledge the University's responsibility to take proactive measures to manage this increased demand. To address these challenges, the University has implemented a comprehensive FOI Action Plan designed to improve processing efficiency and maintain compliance with statutory obligations. Key initiatives have been developed in line with [OAIC guidance on managing increased FOI requests](#), and include:

- Additional resourcing, comprising of:

- recruitment of two new positions dedicated to FOI processing, doubling the number of dedicated FOI resources.
- recruitment of a new Associate Director, Information Governance & Access to ensure sufficient capacity for identifying and implementing strategic and operational improvements in meeting FOI obligations.
- Structural reform: integration of the FOI and Privacy Offices into a single Information Governance team, to enable cross-skilling and surge capacity during peak periods.
- Delegation updates: revision of FOI delegations by the Principal Officer to ensure appropriate authority and resources for processing requests and internal reviews.
- Process improvements: streamlined internal consultation and decision-making processes to reduce delays.
- Implementation of OAIC recommendations:
 - updates to the University's FOI webpage to improve accessibility and guidance for applicants and inform applicants of increased processing times.
 - efficient processing strategies, including batching similar requests for allocation to the same case officer.
 - use of standardised templates for applicant communications.
 - engagement with applicants to refine request scope and negotiate extensions, where necessary.
 - formal notification to the OAIC regarding the sustained increase in FOI requests.

A detailed version of the FOI Action Plan is provided in **Attachment 1**.

The University remains committed to transparency and accountability and continues to work diligently to meet its obligations under the FOI Act. We appreciate the OAIC's ongoing support and welcome any further guidance or assistance you may be able to provide in managing this unprecedented demand.

Yours sincerely,

s.47F Personal privacy

26/11/2025 | 9:49 AM AEDT

Professor Rebekah Brown FASSA
Interim Vice-Chancellor & President
Australian National University

Freedom of Information

From: OAIC - FOI DR <foidr@oaic.gov.au>
Sent: Tuesday, December 16, 2025 4:22 PM
To: Vice-Chancellor
Cc: Freedom of Information; STRATHEARN,Tania
Subject: Letter of response to ANU re significant increase in FOI requests [SEC=OFFICIAL]
Attachments: Letter to ANU 161225.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Professor Rebekah Brown FASSA
Interim Vice-Chancellor & President
Australian National University
By email: vc@anu.edu.au

Copied to: foi@anu.edu.au

Dear Professor Brown

Please find [attached](#) a letter from the FOI Commissioner, Alice Linacre, in response to your recent letter on behalf of the ANU.

This letter includes a request for an update from the ANU by **15 June 2026**.

Kind regards

Tania

 **Tania Strathearn**
Director, Reviews and Investigations
Office of the Australian Information Commissioner
Sydney | Box 5288 Sydney NSW 2001
s.47F Personal privacy

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Australian
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Australian National University Freedom of Information Action Plan: *October 2025*

Responsible Officer:
Associate Director, Information Governance & Access
FOI@anu.edu.au

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Introduction

In response to the growing volume and complexity of Freedom of Information (FOI) requests, the Australian National University (the University) is reviewing its practices to ensure it aligns with the Office of the Australian Information Commissioner's (OAIC) guidance and recommendations for agencies.

The University recognises that FOI Act requires agencies to meet strict statutory timeframes, and the OAIC has emphasised that increased demand must be met with appropriate resourcing and strategic planning.

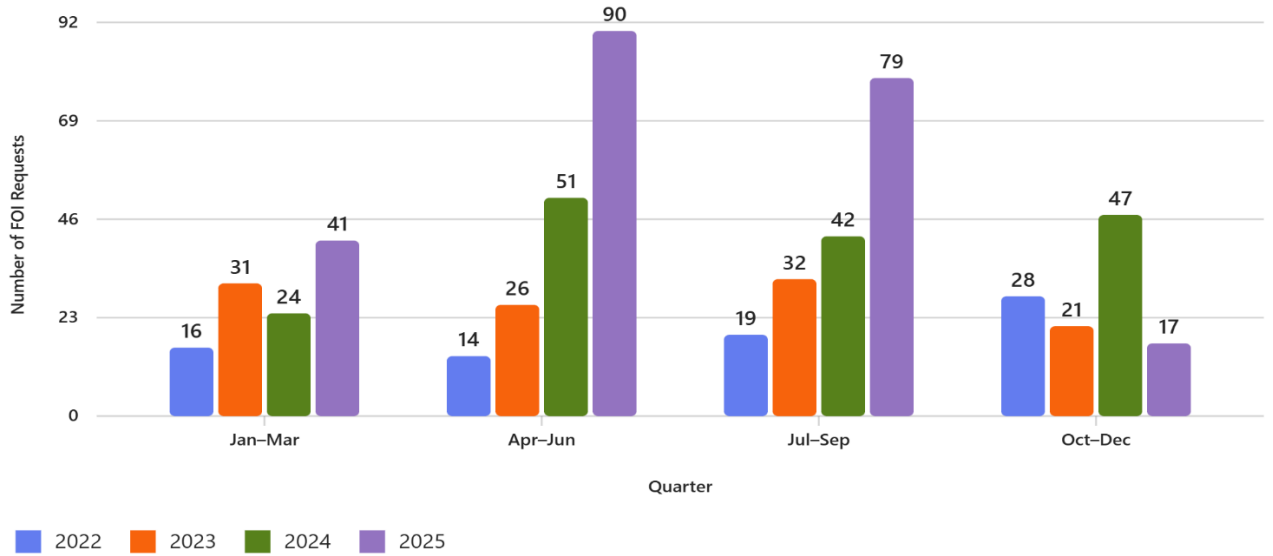
The University has experienced a notable rise in FOI activity, not only in quantity but also in the scope and intricacy of requests. This has placed pressure on existing resources and increased the risk of non-compliance with legislative deadlines. In response, the University has implemented a structured action plan that incorporates the OAIC's recommended strategies, including proactive publication of frequently requested information, refining request scopes in collaboration with applicants, and seeking appropriate extensions under sections 15AA and 15AB of the FOI Act.

This report outlines the University's approach to managing FOI workload sustainably and transparently. It includes measures to improve internal coordination, enhance staff capability, and future-proof FOI processes. By adopting these strategies, the University aims to uphold its obligations under the FOI Act while maintaining service quality and supporting the public's right to access information.

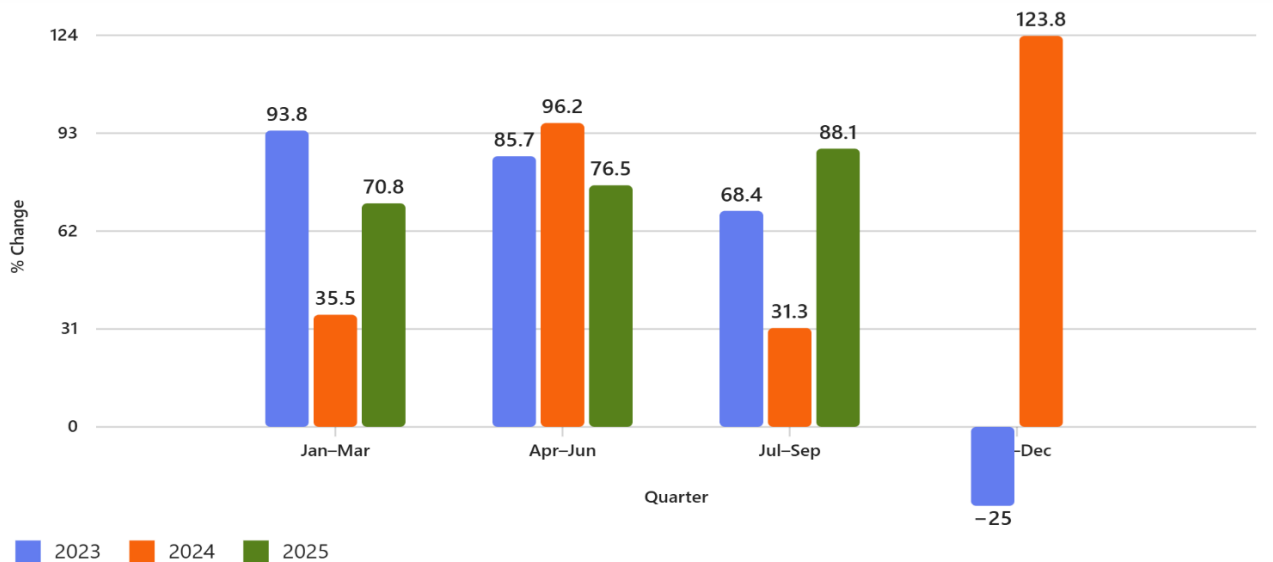
FOI Trends

The graphs and tables below demonstrate a sustained and ongoing increase in FOI requests and Internal Reviews between 2022-2025.

Number of FOI requests by quarter 2022-2025



Percentage change of FOI requests by quarter 2022-2025



Summary of FOI requests by quarter 2022-2025

FOI requests received

	2025		2024		2023		2022
	Received	% change	Received	% change	Received	% change	Received
Jan-Mar	41	+70.8%	24	+35.5%	31	+93.8%	16
Apr-Jun	90	+76.5%	51	+96.2%	26	+85.7%	14
Jul-Sep	79	+88.1%	42	+31.3%	32	+68.4%	19
Oct-Dec	17*	TBA	47	+123.8%	21	-25%	28
Total	227	+38.4%	164	+49.1%	110	+42.9%	77

*NB: Oct-Dec 2025 data correct as at 23 October 2025.

Internal Reviews received

	2025	2024	2023	2022
Jan-Mar	2	3	1	0
Apr-Jun	5	0	2	3
Jul-Sep	3	3	1	1
Oct-Dec	2*	2	1	1
Total	12	8	5	5

*NB: Oct-Dec 2025 data correct as at 23 October 2025.

Action plan

The University's FOI action plan is closely aligned with the OAI's guidance for Managing an Increased Volume of FOI Requests. The measures in this plan aim to ensure timely, efficient processing of FOI requests while maintaining compliance with statutory obligations and supporting public access to information.

OAI Guidance	FOI Team Action Plan
<p>Assess the nature/subject matter of the requests and liaise with the relevant business area(s) to determine: Whether the information sought can be made available through self-service access (for example, My Gov), through existing administrative access schemes or through the establishment of a new administrative access scheme: see the OAI's guidance on administrative access schemes</p> <p>Whether the information sought has been published on the agency's website, including the Information Publication Scheme (IPS) or disclosure log or whether there is information which can be proactively published</p> <p>Whether additional temporary resources are required to manage the increase of requests</p>	<p>Information Made Available Through Self-Service Access The University actively publishes resources on its Information Publication Scheme (IPS) page, accessible at https://www.anu.edu.au/freedom-of-information/information-publication-scheme. In addition, Information Governance and University Records regularly deliver staff training sessions that reinforce the University's pro-disclosure culture.</p> <p>Information Published on the University's Website The FOI webpage provides direct links to the IPS page and includes references to publicly available materials that align with topics of interest frequently raised by FOI applicants.</p> <p>Additional Resources To address increased demand, the University has implemented several resourcing measures: Appointment of two Senior Information Governance & Access Officers to manage the growing volume of FOI requests. This is a 100% increase on resources for FOI processing. Appointment of a new Associate Director, Information Governance & Access, to ensure sufficient capacity for identifying and implementing strategic and operational improvements in meeting FOI obligations. Restructuring the FOI Office and Privacy Office into a single Information Governance team, enabling cross-skilling and providing surge capacity during peak periods.</p>
<p>Update the agency's FOI webpage to include: Information which explains that your agency is experiencing an increase in FOI requests and the impact on the agency's current FOI workload Links to relevant information, including information already published on the disclosure log, IPS or other part(s) of the agency's website or how to seek</p>	<p>Update the Agency FOI web page The FOI team has updated our web pages to include this advice. Pages updated include: https://www.anu.edu.au/freedom-of-information https://www.anu.edu.au/freedom-of-information/foi-requests https://www.anu.edu.au/webform/foi-request-form</p>

<p>information through administrative access schemes</p> <p>Suggestions on how applicants can make ‘targeted’ requests or how to refine the scope of their requests</p> <p>Advice to applicants that the agency may seek s 15AA extensions from applicants or, where appropriate, seek an extension of time from the Office of the Australian Information Commissioner (OAIC)</p> <p>Invitation for applicants to consider making an FOI request at a later date.</p>	
<p>Process the FOI requests efficiently:</p> <p>Consider whether requests can be ‘batched’ or managed in similar groups to process requests quickly and efficiently</p> <p>Develop specific acknowledgment templates which include:</p> <p>Information set out in the agency’s FOI webpage explaining the increase in requests and suggestions for targeted requests, or provide a link to the agency’s FOI webpage where this information has already been released or published</p> <p>Where necessary, requesting the applicant’s agreement to extend the processing timeframe.</p> <p>Develop specific decision templates which clearly set out:</p> <p>The information being released and if the information will be published on the disclosure log or</p> <p>A clear statement of reasons explaining the access refusal reason.</p> <p>Publish information on the disclosure log as soon as possible.</p>	<p>Process the request efficiently</p> <p>Efficient Allocation of Requests: The University assigns similar FOI requests to the same staff member to ensure continuity and reduce duplication of investigative effort.</p> <p>Standardised Documentation: Templates have been developed for all FOI-related documents to promote consistency and expedite preparation.</p> <p>Digital Case Management: An online FOI Planner is utilised to monitor case deadlines and identify matters approaching critical timeframes, enabling proactive management.</p> <p>Enhanced Public Information: The University has updated its FOI web pages to provide clearer guidance and improve accessibility for applicants.</p> <p>Improved Decision Frameworks: Decision templates and review reports have been revised in line with recent OAIC examples to ensure compliance and best practice.</p> <p>Timely Disclosure: The disclosure log is updated as promptly as possible following each decision. Notably, the University’s disclosure log includes both detailed information and the actual documents released, which exceeds the level of disclosure provided by many other agencies.</p> <p>Agency arrangements: The Principal Officer has revised the University’s FOI delegations to ensure that appropriate authority and resources are available for processing requests and managing internal reviews. This update strengthens operational capacity and supports timely compliance with statutory obligations under the FOI Act.</p>
<p>Engage with applicants: applicants may be willing to revise the scope of their request if it means a faster outcome.</p> <p>Offer suggestions to applicants, including how the scope could be refined to speed up the processing of the request, or offer a staged release of</p>	<p>Engage with applicants</p> <p>Before acknowledging each FOI request, the University reviews the scope to determine whether the request is actionable. Where clarification is required, the University contacts applicants to provide guidance and collaborate on refining the request to ensure it is actionable and most likely to achieve the applicant’s intended outcome.</p>

documents to facilitate access in stages over an agreed period.	
<p>Seek an extension of time from the applicant:</p> <p>Consider including a 15AA request in the acknowledgement email to the applicant where necessary, to save time and ensure applicants are made aware of the challenges with meeting processing timeframes at the outset.</p> <p>Where an agency has been unable to obtain a 15AA agreement, or missed its opportunity to request one before the statutory processing period elapsed, it should still endeavour to speak to applicants as outlined above, to keep applicants informed on progress as well as to explore opportunities for faster outcomes for applicants.</p>	<p>Seek an extension of time from the applicant</p> <p>Managing Increased Demand and Extensions: Due to the significant increase in FOI requests, the University is required to seek extensions in many cases. This is necessary to address a substantial backlog while continuing to receive multiple new requests each week. The University notes that some applicants, despite lodging multiple requests, impose their own timeframes for consideration and rejection, which adds further complexity to processing.</p> <p>Impact on Internal Resources: The growing volume of FOI requests, including multiple requests targeting the same areas within the University, is placing considerable strain on internal resources. This makes it increasingly challenging for colleagues to meet search requirements within statutory timeframes. The University acknowledges and appreciates the ongoing assistance provided by staff across campus and will issue communications highlighting the escalating demands, associated time pressures, and expressing gratitude for their continued support in managing this unprecedented workload.</p>
<p>Seek an extension of time from the OAIC where appropriate including where a particular request is complex or voluminous to deal with, or where the agency has been unable to meet the statutory timeframe and the decision has become deemed. See Apply for an extension of time to process a freedom of information request and Part 3: Processing and deciding on requests for access.</p>	<p>Seek an extension of time from the OAIC</p> <p>The University has, and will continue to, proactively engage with the OAIC on requests for extensions, as appropriate, on a case-by-case basis.</p>
<p>Notify applicants of their review rights in relation to a deemed decision: where the agency has been unable to meet the statutory timeframe, notify the applicant of their right to seek IC review in relation to the deemed decision, including an assurance to the applicant that the agency remains committed to continuing to process the request as quickly as possible.</p>	<p>Notify applicants of their review rights</p> <p>The University ensures that review rights are clearly explained in all decision letters issued to applicants. In parallel with the increase in FOI requests, the University has experienced a corresponding rise in internal review applications, which has further impacted workload and resource allocation.</p> <p>Recent changes in OAIC practice now require the University to address and prepare a detailed case in response to any external review requests before the OAIC undertakes its own assessment. While improving decision making and applicant' understanding, this additional procedural step has placed further demands on already constrained resources.</p>

<p>Consider whether internal review is available to the applicant before making an internal review decision: if the applicant is seeking an internal review of a decision that was made outside of the statutory timeframe, internal review is not available. Ensure review rights included with decisions are accurate, by referring applicants directly to IC review where the initial decision was deemed.</p>	<p>Consider whether internal review is available to the applicant before making an internal review decision The University confirms that this practice is followed. Before making an internal review decision, the University assesses whether internal review is available to the applicant. Where the original decision was made outside the statutory timeframe, internal review is not offered, and applicants are referred directly to the Information Commissioner for review. All decision letters include accurate review rights to ensure compliance.</p>
<p>Keep the OAIC informed by advising of the increase of FOI requests and your agency’s action plan. This will assist the OAIC in managing any incoming extension of time (EOT) applications (see below), complaints or IC reviews of deemed access refusal matters: see FOI Guidelines Part 10: Review by the Information Commissioner.</p>	<p>Keep the OAIC informed The University previously advised the Assistant Commissioner, Freedom of information of the increased FOI requests, via email, on 6 August 2024. This action plan was developed in 2024 has been reviewed and updated, to implement additional actions taken in 2025.</p>
<p>Future proof the agency: Develop whole of agency plans to handle future increases, including training staff across the agency to: register and acknowledge requests process requests for the search and retrieval of documents make decisions on requests.</p>	<p>Future Proof the Agency The University has made significant changes to FOI resourcing in 2025. To address increased demand, the University has implemented several resourcing measures: Appointment of two Senior Information Governance & Access Officers to manage the growing volume of FOI requests. Appointment of a new Associate Director, Information Governance & Access, to ensure sufficient capacity for identifying and implementing strategic and operational improvements in meeting FOI obligations. Restructuring the FOI Office and Privacy Office into a single Information Governance team, enabling cross-skilling and providing surge capacity during peak periods.</p>