Office of the Information Commissioner
Queensland

Decision and Reasons for Decision

Citation:	***F93 and Queensland Corrective Services*** **[2022] QICmr 11 (8 March 2022)**
Application Number:	**315758**
Applicant:	**F93**
Respondent:	**Queensland Corrective Services**
Decision Date:	**8 March 2022**
Catchwords:	**ADMINISTRATIVE LAW - RIGHT TO INFORMATION - EXEMPT INFORMATION - PUBLIC SAFETY INFORMATION - names of public servants - whether disclosure could reasonably be expected to endanger a person's life or physical safety - whether disclosure could reasonably be expected to result in a person being subjected to a serious act of harassment or intimidation - whether access may be refused under section 67(1) of the *Information Privacy Act 2009* (Qld) and sections 47(3)(a) and 48 and schedule 3, sections 10(1)(c) or 10(1)(d) of the *Right to Information Act 2009* (Qld)** **ADMINISTRATIVE LAW - RIGHT TO INFORMATION - REFUSAL OF ACCESS - CONTRARY TO THE PUBLIC INTEREST INFORMATION - workplace information - names of public servants - personal information and privacy - prejudice to security and good order of a corrective services facility - prejudice to management function of agency - whether disclosure of information would, on balance, be contrary to the public interest - section 67(1) of the *Information Privacy Act 2009* (Qld) and sections 47(3)(b) and 49 of the *Right to Information Act 2009* (Qld)**

REASONS FOR DECISION

Summary

1. The applicant applied to Queensland Corrective Services (**QCS**) under the *Information Privacy Act 2009* (Qld) (**IP Act**) for access to certain information connected with his incarceration in various correctional centres.[1]

[1] The applicant made a number of access requests which QCS refused to process on the grounds that it was unable to identify the information that the applicant was seeking to access. Correspondence passed between QCS and the applicant about the scope of the application. QCS eventually accepted an application from the applicant that it deemed to be valid on 10 June 2020.

2. QCS did not issue a decision within the requisite timeframe contained in the IP Act and was therefore deemed to have refused access to the requested information.[2]

3. The applicant applied to the Office of the Information Commissioner (**OIC**) for external review of QCS's decision.[3]

4. For the reasons explained below, I vary QCS's deemed refusal of access to the information in issue.

Background

5. Upon QCS giving its purported access decision to the applicant, it sent to him a disc containing the documents it had decided to release to him. The applicant's initial contact with OIC was to advise that the disc he had received from QCS was empty, and to request that OIC intervene to facilitate the release of the documents to him.

6. OIC contacted QCS to ask that it send the applicant a fresh disc containing the released documents. OIC then advised the applicant that, unless we heard from him to the contrary by 18 February 2021, we would proceed on the basis that he was satisfied with the information released to him, and we would close our file.

7. As the applicant did not respond by the due date, OIC finalised the review and advised the applicant accordingly.[4]

8. The applicant then contacted OIC on 31 March 2021 to advise that he had only been able to print the documents from the disc on 23 February 2021, and had also experienced difficulties in preparing correspondence. Having now had the opportunity to review the documents, he wanted OIC to review the information to which he had been refused access by QCS. He also wished to raise sufficiency of search concerns. He therefore requested that OIC proceed with the review.

9. OIC considered the applicant's request and wrote to the applicant on 29 April 2021 to explain why OIC was not inclined to exercise its discretion to re-open the review. The applicant was invited to provide any additional relevant information in support of his position by 14 May 2021.

10. The applicant provided further information on 11 May 2021. OIC considered this information and discussed the various issues raised by the applicant with QCS, including his sufficiency of search concerns. OIC requested that QCS provide further information about the searches it had conducted.

11. By letters dated 13 August 2021, OIC advised both the applicant and QCS that OIC had exercised its discretion to re-open the review.

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[2] On 12 June 2020, QCS wrote to the applicant to confirm that his application was deemed valid on 10 June 2020 and to request a three month extension to the 25 business day statutory processing time *'in the possible event of a shutdown of the RTI and Privacy unit of QCS due to the COVID 19 health situation*'. QCS also advised the applicant that he would be taken to have agreed to the extension unless QCS heard otherwise from him, and that if he did not agree to the extension and his application was unable to be processed within time, he would be issued with a deemed decision refusing access. However, QCS did not subsequently advise the applicant that a shutdown of its RTI and Privacy unit had, in fact, occurred, so as to enliven its contingent three month extension request. In those circumstances, I do not consider that QCS's letter of 12 June 2020 can be regarded as a valid request for an extension of time. In any event, even if the extension request were valid, QCS's purported decision dated 11 November 2020 was not issued within the extended period, which expired on 15 October 2020. QCS is therefore deemed to have refused access to the requested information (section 66 of the IP Act).

[3] On 2 December 2020.

[4] Letter dated 8 March 2021.

Reviewable decision

12. The decision under review is QCS's deemed refusal of access.

Evidence considered

13. Significant procedural steps relating to the external review are set out in the Appendix.

14. The evidence, submissions, legislation and other material I have considered in reaching my decision are set out in these reasons (including footnotes and the Appendix). I have taken account of the applicant's submissions to the extent that they are relevant to the issues for determination in this review.[5]

15. I have also had regard to the *Human Rights Act 2019* (Qld) (**HR Act**), particularly the right to seek and receive information.[6] I consider a decision-maker will be '*respecting, and acting compatibly with*' that right and others prescribed in the HR Act, when applying the law prescribed in the IP Act and the *Right to Information Act 2009* (Qld) (**RTI Act**).[7] I have acted in this way in making this decision, in accordance with section 58(1) of the HR Act. I also note the observations made by Bell J on the interaction between equivalent pieces of Victorian legislation:[8] '*it is perfectly compatible with the scope of that positive right in the Charter for it to be observed by reference to the scheme of, and principles in, the* Freedom of Information Act*.*'[9]

Information in issue

16. Most of the issues raised by the applicant were resolved during the external review process. The only information remaining in issue comprises references to the names of correctional officers who authored case notes generated about the applicant during his incarceration between 1 March 2017 and 27 May 2020 (**Information in Issue**).

Issue for determination

17. The issue for determination is whether access to the Information in Issue may be refused under the IP Act because it is exempt information or because its disclosure would, on balance, be contrary to the public interest.

Relevant law

18. Under the IP Act, an individual has a right to be given access to documents of an agency to the extent they contain the individual's personal information.[10] However, this right is subject to provisions of the IP Act and RTI Act including the grounds on which an agency may refuse access to documents.[11] An agency may refuse access to

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[5] Including the external review application and correspondence dated 4 December 2021.
[6] Section 21(2) of the HR Act.
[7] *XYZ v Victoria Police (General)* [2010] VCAT 255 (16 March 2010) (***XYZ***) at [573]; *Horrocks v Department of Justice (General)* [2012] VCAT 241 (2 March 2012) at [111].
[8] *Freedom of Information Act 1982* (Vic) and the *Charter of Human Rights and Responsibilities Act 2006* (Vic).
[9] *XYZ* at [573].
[10] Section 40 of the IP Act.
[11] Section 67(1) of the IP Act provides that an agency may refuse access to a document in the same way and to the same extent it could refuse access to the document under section 47 of the RTI Act were the document to be the subject of an access application under the RTI Act.

exempt information[12] or to information the disclosure of which would, on balance, be contrary to the public interest.[13]

19. In assessing whether disclosure of information would, on balance, be contrary to the public interest, a decision maker must:[14]

- identify factors irrelevant to the public interest and disregard them
- identify factors in favour of disclosure of information
- identify factors in favour of nondisclosure of information; and
- decide whether, on balance, disclosure of the information would be contrary to the public interest.

20. Schedule 4 of the RTI Act contains non-exhaustive lists of factors that may be relevant in determining where the balance of public interest lies in a particular case. I have considered these lists,[15] together with all other relevant information, in reaching my decision. I have kept in mind the IP Act's pro-disclosure bias[16] and Parliament's requirement that grounds for refusing access to information be interpreted narrowly.[17]

Submissions

21. QCS objected[18] to disclosure of the Information in Issue on the following grounds:

- the case notes record the applicant's harassing behaviour and threats to staff whilst carrying out their duties
- the applicant's prison record indicates he targets individual officers
- evidence contained within the documents processed in applications made by this applicant indicate his behaviour has not changed - he continues to harass and threaten staff; and
- release of the names of the authors of the case notes to the applicant would endanger the safety of staff who have contact with the applicant and therefore also compromise the safety and security of a correctional centre.

22. After considering QCS's submissions, the Assistant Information Commissioner (**AIC**) expressed to the applicant the preliminary view[19] that disclosure of the Information in Issue would, on balance, be contrary to the public interest.

23. The AIC gave the following reasons:

- while the names of public service officers appearing in a routine work context are often disclosed under the IP Act and RTI Act, the work environment of correctional officers is one where safety and security of prisoners, prison staff

[12] Schedule 3 of the RTI Act specifies the types of information that Parliament has determined are exempt because release would be contrary to the public interest.
[13] Section 67(1) of the IP Act and section 47(3)(b) and 49 of the RTI Act. The term public interest refers to considerations affecting the good order and functioning of the community and government affairs for the well-being of citizens. This means that, in general, a public interest consideration is one which is common to all members of, or a substantial segment of the community, as distinct from matters that concern purely private or personal interests. However, there are some recognised public interest considerations that may apply for the benefit of an individual.
[14] Section 49(3) of the RTI Act.
[15] I have considered each of the public interest factors outlined in schedule 4 of the RTI Act, and any relevant factors are discussed below (in relation to each category of documents).
[16] Section 64 of the IP Act.
[17] Section 67(2) of the IP Act and section 47(2) of the RTI Act. In deciding whether disclosure of the Information in Issue would, on balance, be contrary to the public interest, I have taken no irrelevant factors into account in making my decision.
[18] Letter dated 19 October 2021. At the time QCS provided its submission, the applicant was an inmate. He has since been released.
[19] Letter dated 25 November 2021.

and the community must be carefully monitored and managed, and in this respect, is quite different to the work environment of most public servants
- correctional officers must be able to accurately record their observations, interactions and concerns while undertaking their duties without fear of being targeted by prisoners or other adverse actions being taken against them
- although there may be certain circumstances where officers' names are released, this would depend on the context and surrounding circumstances
- generally, privacy and personal information considerations are higher for those officers managing day-to-day functions within a prison and issues with ensuring safe and secure functioning of the prison can also be relevant
- the case notes reflect significant tensions with the applicant over various issues, which prison staff needed to record to ensure effective communication in managing these issues
- the applicant had received access to essentially all information in the case notes, except for correctional officer names: the information already disclosed therefore showed how the applicant's concerns and welfare were managed during the relevant period
- releasing officer names would therefore provide no significant meaningful insight into actions taken by QCS; and
- while transparency and accountability public interest factors applied, they carried low weight in these circumstances and were significantly outweighed by privacy, personal information and security considerations.

24. The applicant did not accept the AIC's preliminary view and provided a submission[20] in support of his case for disclosure of the Information in Issue. The applicant argued that:

- the information contained in the case notes is about the applicant and he is entitled to know who wrote the notes
- some case notes constitute 'evidence'
- correctional officers are public servants and their identities in connection with their work duties should not be kept confidential
- identities of correctional officers have been released to him in the past and there is no evidence that he targeted any correctional officer as a result of those releases or took any adverse action against any officer
- correctional officers wear name badges that identify them and so disclosure of their names in connection with case note entries would not constitute a significant beach of their privacy; and
- where a prisoner has been released from a correctional facility, there can no longer be any valid concerns about adverse actions being taken by them against correctional officers or any other concerns about safety and security.

Discussion

Exempt information

25. In its brief submission, QCS appeared to raise the possible application of two exemption provisions:

- information is exempt information if its disclosure could reasonably be expected to endanger a person's life or physical safety;[21] and

[20] Dated 4 December 2021 and received by OIC on 13 December 2021.
[21] Schedule 3, section 10(1)(c) of the RTI Act.

- information is exempt information if its disclosure could reasonably be expected to result in a person being subjected to a serious act of harassment or intimidation.[22]

26. QCS did not provide detailed submissions or evidence in support of the application of these exemption provisions, but simply submitted that the case notes about the applicant indicated that he regularly harassed, threatened and targeted officers and that release of officers' identities as authors of the case notes would endanger their safety.

27. I accept that the case notes indicate that the applicant made complaints and raised numerous issues about a variety of matters while incarcerated. He complained about, and objected to, many management actions taken in respect of him, and his treatment by correctional officers generally, and was often defiant when given a direction. However, I am not satisfied that QCS has discharged the onus upon it[23] to establish that access to the Information in Issue should be refused because its disclosure could reasonably be expected to[24] result in the prejudicial effects contemplated by either exemption provision. The requirements for each exemption provision have been discussed previously in OIC decisions.[25]

28. I am not satisfied on the basis of the Information in Issue and QCS's submissions that the applicant has taken action, or threatened to take action, that could reasonably be regarded as constituting endangerment to an officer's life or physical safety. And, while the applicant may have made many complaints about correctional officers and actions taken in the course of managing his incarceration, and resisted and defied directions issued to him, I am not satisfied that his actions in that regard are sufficient to constitute a serious[26] act of harassment or intimidation. I also note that the applicant is no longer incarcerated, thereby reducing the opportunity to engage in a serious act of harassment or intimidation against correctional officers.

Finding

29. I am not satisfied on the material before me that the Information in Issue is exempt information under schedule 3, section 10(1)(c) or schedule 3, section 10(1)(d) of the RTI Act.

Contrary to the public interest information

Factors favouring disclosure

30. I recognise the transparency and accountability of government agencies, and of public servants whose positions are funded from the public purse, as public interest factors weighing in favour of disclosure of the Information in Issue.[27]

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[22] Schedule 3, section 10(1)(d) of the RTI Act.
[23] Section 100(1) of the IP Act.
[24] There must be a reasonably based expectation that the consequence identified in the exemption will follow as a result of the information being disclosed. The expectation must be reasonably based, not irrational, absurd or ridiculous, and there must be more than a mere possibility (ie speculative, conjectural or hypothetical) or risk regarding the consequence: *Attorney-General's Department v Cockcroft* (1986) 64 ALR 97 at [106].
[25] See, for example, *Murphy and Queensland Treasury* (1995) 2 QAR 744 regarding endangerment to life and physical safety, and *Richards and Gold Coast City Council* (Unreported, Queensland Information Commissioner, 28 March 2012) regarding a serious act of harassment or intimidation.
[26] See *6ZJ3HG and Department of Environment and Heritage Protection; OY76VY (Third Party)* [2016] QICmr 8 (24 February 2016) at [33]: the exemption's reference to a 'serious' act of harassment or intimidation indicates that it was Parliament's intention that some degree of low level harassment or intimidation would be tolerated before the exemption could be invoked.
[27] Schedule 4, part 2, items 1 and 3 of the RTI Act.

31. The applicant has been given access to the bulk of the correctional case notes that concern him, but seeks access to the names of the correctional officers who authored the notes. In these circumstances, I afford only low weight to the accountability and transparency disclosure factors. I am not satisfied that disclosure of the names of the correctional officers would advance, to any significant degree, the accountability and transparency of QCS regarding actions it took concerning the applicant.

32. Furthermore, in response to the applicant's submissions, while the case notes may contain the applicant's personal information, the Information in Issue does not. As for the applicant's submission that the case notes constitute 'evidence', it is not clear whether the applicant is raising the possibility of taking legal action against QCS for matters referred to in the case notes. However, even if that were the case, I am not satisfied that he requires access to the names of the case note authors in order to assess his legal rights or any possible cause of action against QCS.[28] To that extent, I am not satisfied that the administration of justice disclosure factors have any application in these circumstances.[29]

33. I note the applicant's submission that correctional officers wear name badges and that there is therefore no distinction between that method of identification and the Information in Issue. However, the name badge identifies correctional officers to others in their place of work. In contrast, disclosure of their names under the IP Act is to be regarded as disclosure to the world at large,[30] which brings with it heightened privacy considerations that I will discuss below.

Factors favouring nondisclosure

34. I recognise the following public interest factors weighing against disclosure of the Information in Issue:

- disclosure could reasonably be expected to prejudice the protection of an individual's right to privacy[31]
- disclosure could reasonably be expected to cause a public interest harm if disclosure would disclose the personal information of a person, whether living or dead[32]
- disclosure could reasonably be expected to prejudice the security or good order of a corrective services facility;[33] and
- disclosure could reasonably be expected to prejudice the management function of an agency.[34]

35. It is clear that the Information in Issue is the personal information[35] of the correctional officers involved. Its disclosure therefore automatically gives rise to a public interest harm in disclosure. There is also an associated public interest in protecting the privacy interests of the persons concerned. The concept of privacy is not defined in the IP Act

[28] Consistent with the notion of responsible government: see *Chief Executive Officer, Services Australia and Justin Warren* [2020] AATA 4557 (9 November 2020) (***Warren***) at [115].
[29] Schedule 4, part 2, items 16 and 17 of the RTI Act.
[30] Noting that '*There is no provision of that Act which contemplates any restriction or limitation on the use which that person can make of that information, including by way of further dissemination*' – see *FLK v Information Commissioner* [2021] QCATA 46 at [17].
[31] Schedule 4, part 3, item 3 of the RTI Act.
[32] Schedule 4, part 4, item 6 of the RTI Act.
[33] Schedule 4, part 3, item 10 of the RTI Act.
[34] Schedule 4, part 3, item 19 of the RTI Act.
[35] *'Personal information'* is defined in section 12 of the IP Act as *'information or an opinion, including information or an opinion forming part of a database, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent or can reasonably be ascertained, from the information or opinion'.*

or RTI Act, but it can be viewed as the right of an individual to preserve their *'personal sphere'* free from interference from others.[36]

36. In ordinary circumstances, low weight is afforded to the public interest in protecting the privacy interests of public servants in connection with disclosure of routine employment information.[37] For greater weight to be given to this factor, it must be demonstrated that special circumstances exist.

37. In my view, the correctional services environment may give rise to such special circumstances. As the AIC observed in the preliminary view letter sent to the applicant, the work environment of correctional officers is one where the safety and security of prisoners and prison staff must be carefully monitored and managed, not only for their benefit, but for the benefit of the general community. In this respect, it is significantly different from the work environment of most public servants. I accept the general proposition that privacy and personal information considerations may often be higher for those officers managing day-to-day functions within a prison. It is important to note, however, that the correctional services environment does not, of and by itself, automatically render the public interest in protecting the privacy of correctional officers so weighty that their names in connection with their work duties will never be disclosed. The particular circumstances of each case must be taken into account when considering the application of this factor and the weight to be afforded to it.

38. Here, the Information in Issue identifies correctional officers in connection with case notes that they generated about the applicant. The case notes record information about the applicant and observations about his day-to-day activities, behaviour and interactions with staff and other prisoners. The notes contain information of a factual nature, but they also record the author's interpretation of observed events and their opinions about those events, behaviours, interactions, etc.

39. Further, I accept QCS's submission that the applicant's prison history indicates his propensity to persistently make demands of, argue with, and complain about, officers in connection with their management of him. The case notes record numerous instances of verbal altercations and heated arguments with correctional officers over a wide variety of issues, and include threats by the applicant to make formal complaints and take legal action.

40. Given QCS's role, and taking into account the context in which correctional officers' names are recorded, as well as the abovementioned conduct of the applicant, I accept that disclosure gives rise to a reasonably based expectation that correctional officers may be targeted or subjected to other adverse action where, as in this case, prisoners disagree with, or take exception to, the information, observations and opinions recorded by officers. As such, I find that the context and environment in which the case notes are recorded give rise to a heightened public interest in protecting the personal information and privacy interests of the officers concerned.

41. The applicant argues that, given that he is no longer incarcerated, there can no longer be any valid concerns about adverse actions being taken by him against correctional officers or any other concerns about impacting the good order and security of a correctional facility as a result of disclosure of the Information in Issue. However, as was recognised by the Administrative Appeals Tribunal in *Warren,* and discussed in a

[36] *Matthews and Gold Coast City Council* (Unreported, Queensland Information Commissioner, 23 June 2011) at [22] paraphrasing the Australian Law Reform Commission's definition of the concept in 'For your information: Australian Privacy Law and Practice' Australian Law Reform Commission Report No. 108 released 11 August 2008, at paragraph 1.56. The report is available at https://www.alrc.gov.au/wp-content/uploads/2019/08/108_vol1.pdf.
[37] See, for example, *O52 and Queensland Ombudsman* [2020] QICmr 31 (11 June 2020) at [66].

Position Paper issued by the Australian Information Commissioner concerning disclosure of the names and contact details of Commonwealth public servants,[38] the evolution of the digital environment gives rise to new risks for public servants (as well as for citizens generally). These risks include the traceability and trackability of public servants' personal lives, with resultant privacy infringements, and the risk of harassment.

42. While the applicant may argue that there is no evidence to establish that he has engaged in inappropriate social media contact with, or online harassment of, correctional staff, as I have noted at paragraph 33 above, the IP Act does not limit what a person may do with information released to them, including choosing to publish that information in some form or other. If that occurs, *'modern means of communications enable information to be disseminated very broadly and very quickly'.*[39] I accept that such dissemination increases the risk of correctional staff being targeted on social media or subjected to online harassment.

43. I recognise the importance to the good management of correctional facilities and the associated safety of prisoners, staff and the community generally, of open and effective communication about the daily management of prisoners. As noted, the case notes reflect significant tensions with the applicant over various issues. Ensuring effective communication within the correctional facility in managing these issues required correctional officers to record their open and frank observations and opinions about the issues, the applicant's reaction to them, and his interactions with others.

44. I am satisfied that disclosure of the officers' identities in connection with this information, and taking account of the nature of the applicant's interactions with officers, could reasonably be expected to result in officers being reluctant, in future similar circumstances, to record full and frank observations about prisoner behaviour, with an associated prejudice to the security or good order of a corrective services facility.

45. Lastly, given that I am satisfied that disclosure of the Information in Issue could reasonably be expected to result in correctional officers being subjected to adverse action, it follows that I am also satisfied that disclosure could reasonably be expected to prejudice QCS's ability to manage its staff.

46. QCS is obliged to provide its employees with a safe working environment and to protect them against harm to their health, safety and welfare through the elimination or minimisation of risks arising from work.[40] Where disclosure of identifying information exposes correctional officers to the risk of being targeted or harassed, or subjected to other adverse action, this is a risk of the sort that QCS is obliged to take into account and to take reasonable steps to eliminate or minimise in fulfilling its workplace safety obligations to its employees. I am satisfied that a failure to do so could reasonably be expected to result in prejudice to QCS's staff management functions.[41]

Findings

47. For the reasons discussed above, I afford low weight to the two public interest factors favouring disclosure identified at paragraph 30 above, and significant weight to the four public interest factors favouring nondisclosure identified at paragraph 34 above.

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[38] Disclosure of public servants' name and contact details in response to FOI requests - Home (oaic.gov.au)
[39] See *Warren* at [118].
[40] Section 19 of the *Work Health and Safety Act 2011* (Qld).
[41] See *Warren* at [134].

48. After weighing the public interest factors favouring disclosure and nondisclosure, I find that disclosure of the Information in Issue would, on balance, be contrary to the public interest and access may be refused on this basis.

DECISION

49. I vary QCS's deemed refusal of access by finding that access to the Information in Issue may be refused under section 67(1) of the IP Act and sections 47(3)(b) and 49 of the RTI Act because its disclosure would, on balance, be contrary to the public interest.

50. I have made this decision as a delegate of the Information Commissioner, under section 139 of the IP Act.

A Rickard
Acting Right to Information Commissioner

Date: 8 March 2022

APPENDIX

Significant procedural steps

Date	Event
2 December 2020	External review application received.
3 December 2020	QCS requested to provide initial documents.
17 December 2020	QCS provided initial documents.
28 January 2021	Letter to QCS requesting that it provide the applicant with a fresh copy of the released documents. Letter to applicant advising that if no response received by 18 February 2021, the review would be closed.
8 March 2021	Letter to applicant advising of closure of review.
31 March 2021	Correspondence received from applicant requesting re-opening of the review.
29 April 2021	Letter to the applicant declining to re-open the review.
11 May 2021	Correspondence received from the applicant.
3 June 2021	Request to QCS to provide information.
28 June 2021	Follow-up request sent to QCS.
19 July 2021	Response received from QCS. Further request to QCS for information.
28 July 2021	QCS provided further information.
13 August 2021	Letter to QCS advising that review re-opened.
16 August 2021	Preliminary view communicated to applicant.
31 August 2021	Correspondence received from applicant.
2 September 2021	Letter to applicant.
16 September 2021	Correspondence received from applicant.
28 September 2021	Letter to QCS proposing informal resolution of review.
5 October 2021	Email from QCS declining informal resolution proposal.
14 October 2021	Letter to QCS requesting provision of additional Information in Issue and a submission.
19 October 2021	Response received from QCS.
25 November 2021	Preliminary view communicated to applicant.
13 December 2021	Submission received from applicant.