



Decision and Reasons for Decision

Citation:	<i>J37 and Department of State Development, Infrastructure and Planning (Office of Industrial Relations) [2025] QICmr 10 (12 March 2025)</i>
Application Number:	318064
Applicant:	J37
Respondent:	Department of State Development, Infrastructure and Planning (Office of Industrial Relations)
Decision Date:	12 March 2025
Catchwords:	ADMINISTRATIVE LAW - RIGHT TO INFORMATION - compliance with application requirements - whether agency was entitled to refuse to deal with an access application on the basis that it does not comply with all relevant requirements - requirement to give sufficient information concerning the requested documents to enable a responsible officer of the agency or Minister to identify them - terms of application requiring the decision-maker to intervene before the documents can be identified - section 33 of the <i>Right to Information Act 2009</i> (Qld) - section 24(2)(b) of the <i>Right to Information Act 2009</i> (Qld)

REASONS FOR DECISION

Summary

1. The applicant applied¹ to the Office of Industrial Relations (**OIR**)² under the *Right to Information Act 2009* (Qld) (**RTI Act**). In his application, he requested certain documents and information.
2. OIR consulted with the applicant regarding compliance with certain application requirements, including the requirement to give sufficient information concerning the requested documents to enable OIR to identify them.³ The applicant responded.⁴ OIR then decided⁵ that the application did not give sufficient information and therefore did not comply with all relevant application requirements.⁶

¹ The applicant submitted an application form on 2 May 2024 and paid the application fee on 21 May 2024.

² At this time, OIR was part of the Department of State Development and Infrastructure, however, following machinery of government changes, OIR became part of the Department of State Development, Infrastructure and Planning on 1 November 2024.

³ Under section 33 of the RTI Act. Email from OIR to applicant dated 15 May 2024.

⁴ Email from applicant to OIR dated 21 May 2024.

⁵ Decision dated 7 June 2024.

⁶ Under section 24 of the RTI Act.

3. The applicant applied to the Office of the Information Commissioner (**OIC**) for external review of OIR's decision.⁷
4. For the reasons set out below, I affirm OIR's decision and find that OIR was entitled to refuse to deal with the access application⁸ on the basis that it does not comply with the requirement to give sufficient information,⁹ and therefore does not comply with all relevant application requirements.

Background

5. Along with his application for external review, the applicant provided a copy of a letter from Officer A to him dated 19 May 2023, which advised him that '*an internal review of the internal assessment has been completed*' and informed him of the outcome of the internal review.¹⁰ Having noted the contents of this letter, I understand that the events preceding the applicant's access application and this external review were:¹¹
 - **incident** – employees of a certain company allegedly undertook activities at a particular location
 - **incident notification** - the applicant made an incident notification to OIR's Electrical Safety Office (**ESO**) regarding the activities, which was assigned an event reference number
 - **incident notification outcome** - OIR advised the applicant of the outcome of his notification
 - **initial customer service complaint** – after receiving the outcome of the incident notification from OIR, the applicant made a new complaint which was treated as a customer service complaint
 - **internal assessment** – an ESO officer, Officer B, made inquiries and completed an internal assessment regarding this complaint
 - **internal assessment outcome** – OIR notified the applicant of the outcome of the internal assessment
 - **second customer service complaint** – the applicant was dissatisfied with the outcome of the initial customer service complaint and, on 14 March 2023, made a further complaint addressed to Officer C, which was treated as a second customer service complaint
 - **internal review** – in response to the applicant's second customer service complaint, OIR conducted an internal review of the internal assessment
 - **internal review outcome** - Officer A sent the letter to the applicant (as referred to above) on 19 May 2023 and/or 22 June 2023, advising him that '*an internal review of the internal assessment has been completed*' and informing him of the outcome of the internal review.

⁷ On 7 June 2024.

⁸ Under section 33(6) of the RTI Act.

⁹ As required by section 24(2)(b) of the RTI Act.

¹⁰ As well as sighting the copy of the letter dated 19 May 2023, as provided with the applicant's external review application, I have also sighted another version of the letter dated 22 June 2023, which was subsequently provided to OIC by the applicant on 24 June 2024. Other than the dates of the letters, some formatting, and the mention of review rights at the end of the letter dated 22 June 2023, the contents of the two letters appears to be identical.

¹¹ Note – for the purpose of de-identifying this decision, this summary of relevant events only includes the dates of the two events referenced in the applicant's access application.

6. In his access application, the applicant requested:^{12,13}

Document containing the issues/errors (made by the investigators) noted into the findings of the internal assessment to the Complaint made by the Applicant March 14th March 2023 concerning the incident [location] [event reference number].

Highlighted Operational Training for the staff in the investigation, as noted in the letter from [Officer A]...

*Reasons or documentation to verify [Officer A's] reasons for refusing reinvestigation and documentation of reasons why passage of time was used to refuse re-investigation.
REFER : to the email from [Officer A] dated 19 May 2023.*

7. In his response to OIR's consultation regarding compliance requirements, the applicant stated:¹⁴

*What I am seeking is the outcome of the investigation failings as highlighted by [Officer C], in actions of failure to investigate the complaint, in summarized detail. Detail of actions of failure in this investigation of the complaint as per [Officer C's] email by the investigators.
The summary of added operational training in reference to the failed investigation as per the email.*

Detailed (highlighted) reasons and documentation (policy, practises) of refusal to re-investigate, that were noted in both emails ([Officer C] and [Officer A]).

NO documents to be sent that do not pertain to this application.

8. In the reasons for its decision that the applicant had not complied with all relevant application requirements, OIR stated:

The information you are seeking access appears to relate to a customer complaint you lodged however, you have provided the reference number of the Workplace Health and Safety (WHSQ) event and not the customer complaint number. In addition, you refer to an "internal assessment" and "investigation". These are two separate events and managed by different areas within OIR. An investigation will be managed by Statewide Investigations and relates to a WHSQ event whereas an internal assessment is part of OIR's customer complaints policy and refers to the assessment undertaken by a complaints officer reviewing a customer complaint. As such, your scope does not provide sufficient information to enable OIR to direct searches for the information you are seeking.

Similarly, your original scope refers to an email from [Officer A]. However, when you provided further clarification of your scope, you advised that [Officer C] sent the email. You have lodged multiple customer complaints and [Officer A] and [Officer C] have responded on several of those. As such, it is not clear which emails from these individuals you are referring to.

You have also requested the "outcome of the investigation failings." It is not clear whether you are seeking information about investigation failings as contained in the WHSQ event file or in relation to your customer complaint. Further, an investigation failing is a subjective view and your request for "detail of actions of failure in this investigation" requires an RTI Officer to make their assessment of what is considered an investigation failure.

9. In his application for external review application, the applicant stated:

¹² The applicant also provided the following further information:

- type of documents - EMAILS, MEMOS, ELECTRONIC MESSAGING Documentation that verifies the email from [Officer A]
- time period - February 2019 to March 2024
- relevant document reference numbers - Event number [six-digit number].
- location - Electrical Safety Office, Workplace Health and Safety Office of Industrial Relations.

¹³ Apart from using de-identified versions of OIR officers' names, the applicant's and OIR's statements as set out in this decision comprise direct quotes from their correspondence, including any errors therein.

¹⁴ Email from the applicant to OIR dated 21 May 2024.

*This was a internal Event number ([event reference number] [location]) as noted in the Letter from [Officer A], under **evidence considered**. As stated I was only supplying the reference as per the referenced letter. The Customer complaint number was in the Letter of [Officer A] [complaint reference number]. [OIR's RTI decision-maker] did not request anymore reference to help the RTI Office.*

...

*Again as per the [Officer A] email dated 19 May, and repeatedly referenced. [Officer A] noted a internal Assessment (under **evidence committed**), of the (**failed**) investigation of [event reference number]. [OIR's RTI decision-maker] has confused herself with the contents of the requirements.*

Note Investigation is [event reference number] and Internal Assessment is [complaint reference number]

...

*Under **Internal Assessment Findings**, I was noting the requirement of the Investigation failings in my clarification. [Officer C] was the Name and the referral to the ESO Investigation, again noted in the letter. This is the only source of confusion, of which [OIR's RTI decision-maker] did not clarify.*

...

[OIR's RTI decision-maker] then carried on with the confusion:

You have also requested the "outcome of the investigation failings." ...

...

Failing is descriptive as per the letter to take a subjective view would be that the attempt of [OIR's RTI decision-maker] to divert the request for information. This was apparent in her attempt to refuse numerous applications due to the OIR RTI failing to act on application in the required time frame as per the act.

*Failing in the term noted by [Officer A] failed consideration and insufficient inquires,. Thus failing. Required request by the applicant is to supply the **insufficient and failed to relevant inquiries***

Just to Simplify this. I am requiring the:

Information of the detailed, insufficient, failed, and incomplete inquiries of the investigation [event reference number] (**quoted**) **to my complaint. Of which this was noted on the Internal Assessment of** [complaint reference number] ([Officer A] **Letter**). **Highlighted training of the effected staff concerning the Internal Assessment in action to correct failed and insufficient inquiries.**
Reasons why the refusal to re investigate both incidents

Reviewable decision

10. The decision under review is OIR's decision dated 7 June 2024.

Evidence considered

11. Significant procedural steps relating to the external review are set out in the Appendix.
12. 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 into account the applicant's submissions to the extent they are relevant to the issues for determination in this review.
13. I have also had regard to the *Human Rights Act 2019* (Qld) (**HR Act**), particularly the right to seek and receive information.¹⁵ I consider a decision-maker will be 'respecting,

¹⁵ Section 21(2) of the HR Act.

and acting compatibly with' that right, and others prescribed in the HR Act, when applying the law prescribed in the RTI Act.¹⁶ 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 of Bell J on the interaction between equivalent pieces of Victorian legislation:¹⁷ *'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'*.¹⁸

Issue for determination

14. The issue for determination is whether the applicant has given sufficient information concerning the requested documents to enable a responsible officer of OIR to identify them – and hence whether he has complied with all relevant application requirements.

Relevant law

15. The RTI Act requires that an access application must *'give sufficient information concerning the document to enable a responsible officer of the agency or Minister to identify the document'*.¹⁹
16. The Information Commissioner has previously recognised that where there is ambiguity in the terms of an application, it is rarely appropriate to apply legal construction techniques in preference to consulting with the applicant for clarification.²⁰ The scope of an access application should not be interpreted legalistically or narrowly²¹ – however, there are sound practical reasons for the documents sought being clearly and unambiguously identified, given the terms of an application set the direction and parameters of an agency's search efforts.²²
17. Where a person purports to make an access application that does not comply with all relevant application requirements,²³ the agency must:²⁴
- make reasonable efforts to contact the person within 15 business days after the purported application is received
 - inform the person how the application does not comply with the relevant application requirement; and
 - give the applicant a reasonable opportunity to consult with a view to making the application in a form complying with all relevant application requirements
18. If, after giving the applicant a reasonable opportunity to consult with a view to making the application in a form complying with all relevant application requirements, the agency

¹⁶ *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].

¹⁷ *Freedom of Information Act 1982* (Vic) and the *Charter of Human Rights and Responsibilities Act 2006* (Vic).

¹⁸ XYZ at [573].

¹⁹ Section 24(2)(b) of the RTI Act.

²⁰ *Robbins and Brisbane North Regional Health Authority* (1994) QAR 30 at [17].

²¹ *Fennelly and Redland City Council* (Unreported, Queensland Information Commissioner, 21 August 2012) at [21].

²² In this regard, I note the following observations of the Information Commissioner in *Cannon and Australian Quality Egg Farms Ltd* (1994) 1 QAR 491 at [8], when addressing similar considerations under the predecessor to the RTI Act, the repealed *Freedom of Information Act 1992* (Qld) (**FOI Act**): *'The terms in which an FOI access application is framed set the parameters for an agency's response under Part 3 of the FOI Act, and in particular set the direction of the agency's search efforts to locate all documents of the agency which fall within the terms of the FOI access request. The search for relevant documents is frequently difficult, and has to be conducted under tight time constraints. Applicants should assist the process by describing with precision the document or documents to which they seek access'*. These observations were cited with approval in *Rolfe and Banana Shire Council* (Unreported, Queensland Information Commissioner, 9 October 2009) at [109], *O80PCE and Department of Education and Training* (Unreported, Queensland Information Commissioner, 15 February 2010) at [33] and *Ciric and Queensland Police Service* [2018] QICmr 30 (29 June 2018) at [20].

²³ Section 33(7) of the RTI Act.

²⁴ Sections 33(2) and (3) of the RTI Act.

then decides that the application does not comply with all such requirements, the agency must give the applicant prescribed written notice of the decision.²⁵

19. For an external review, the RTI Act does not expressly address the procedure to be followed by the Information Commissioner before making a decision that an access application does not meet the application requirements under the RTI Act. Generally, the Information Commissioner, or their delegate, has the power to decide any matter in relation to an application that could have been decided by the agency; and is required to identify opportunities for early resolution and to promote settlement of external review applications. The procedure to be taken is, subject to the RTI Act, at the discretion of the Information Commissioner.²⁶

Findings

20. During the external review, communications between OIC and the applicant indicated that the focus of his interest was the internal review (not the steps preceding the internal review noted at paragraph 5 above). The letter from Officer A conveying the outcome of the internal review stated as follows:

Internal assessment findings

The findings of this internal assessments are given below and respond directly to your customer complaint of 14 March 2023.

In response to your complaint of 14 March 2023:

...

It was found the internal assessment of your initial customer service complaint of 5 August 2020 was insufficient and failed to consider all relevant inquiries with both internal OIR stakeholders and stakeholders external to OIR.

While acknowledging there were incomplete enquiries associated with the internal assessment of your customer complaint, I have considered the significance of the omission, passage of time and likely probative value of reinvestigating an alleged workplace incident reported to have occurred in May 2020. In this regard, I have determined that actions on findings of this assessment will be focused on opportunities for continuous improvement and accordingly, will not be re-opening the investigation into your original workplace complaint notified to the ESO in August 2022.

Actions arising out your complaint

As a result of your 5 August 2022 complaint, the subsequent internal assessment and your further complaint of 14 March 2022, ESO is working to remedy the issues highlighted in the findings. ESO inspectors involved in this matter will receive operational training to consolidate and improve their ability to scope out potential sources of evidence collection when attending to similar events in the future.

Additional training will be provided to relevant staff in the conduct of internal assessments in accordance with the OIR customer complaint framework.

21. Aspects of this letter are somewhat confusing – for example, the heading of ‘*internal assessment findings*’ and reference to ‘[t]he findings of this internal assessment’, despite the letter conveying the outcome of an internal review of the internal assessment; some

²⁵ Section 33(6) of the RTI Act.

²⁶ Sections 90(1), 95(1)(a) and 105(1) of the RTI Act.

possible errors when stating the dates of some events;²⁷ and the existence of two versions of the outcome letter.²⁸

22. OIC engaged with the applicant, in an attempt to agree on terms for his application, which requested the information of interest to him related to the internal review.²⁹ Unfortunately, despite a number of attempts, agreement could not be reached. In OIC's view, the applicant's proposals raised further issues of noncompliance. For example, the applicant wanted to replace the first paragraph of his access application³⁰ with the following:³¹

The documents in the internal assessment that resulted in the finding that my initial customer service complaint of 5 August 2020 was insufficient and failed to consider all relevant inquiries with both internal OIR stakeholders and stakeholders external to OIR

The documents noted are of failed actions to the investigation...

23. In response, OIC noted that³² this would require the RTI decision-maker to intervene and make enquiries about matters other than document creation and management – ie enquiries to establish which documents among the documents identified by [Officer A] as having being considered by her (under the heading 'Evidence considered' on page 3 of her letter) were relied on by her in making the internal review finding that the internal assessment was insufficient. OIC suggested³³ different ways of capturing information which would indicate what Officer A considered to be relevant and persuasive when making her findings – for example any note/s made by her during the internal review process, and copies of communications with Officer B regarding the internal review. In response,³⁴ the applicant expressed concern that OIC was 'watering down' his application and suggested the following to replace the first paragraph of his access application:³⁵

Noted incomplete enquiries (as noted in her Findings) of the inspectors and any documents/notes created by [Officer A] as part of her internal review. Noted in the Letter.

24. Taking into account the confusing aspects of the outcome letter noted at paragraph 21 above, and some further confusion arising from OIC's early communications with the applicant, OIC gave him several opportunities to make the scope of his access application compliant, so as to re-frame it into a form that would enable OIR to identify the requested documents. In giving these opportunities, I consider that OIC exceeded the procedural requirements OIR was required to fulfil before making a decision under section 33 of the RTI Act. I therefore consider it clear that the applicant has been afforded procedural fairness.
25. The final proposal made by the applicant in this external review regarding wording of his access application is:³⁶

Requirement One as sent to the Office of Industrial Relations ... :

²⁷ For example, references to both 5 August 2020 and 5 August 2022; and to both 14 March 2022 and 14 March 2023.

²⁸ See comments at footnote 10 above.

²⁹ In line with OIC's obligation to identify early resolution opportunities and promote settlement of the external review application (section 90(1) of the RTI Act).

³⁰ Which requested 'Document containing the issues/errors (made by the investigators) noted into the findings of the internal assessment to the complaint made by the applicant March 14th March 2023 concerning the incident [location] [event reference number]' [sic] – as set out at paragraph 6 above.

³¹ Email to OIC dated 5 July 2024.

³² Email dated 16 September 2024 and letter dated 19 September 2024.

³³ Letter dated 19 September 2024.

³⁴ Letter received on 19 September 2024.

³⁵ Letter received on 19 September 2024.

³⁶ Letter received on 27 October 2024.

Document containing the issues/errors (made by the investigators) noted into the findings of the internal assessment to the complaint made by the applicant March 14th March 2023 concerning the incident [location] [event reference number].

This is in response to [Officer A's] Decision email [complaint reference number] stated notation:

It was found the internal assessment of your initial customer service complaint of 5 August 2020 was insufficient and failed to consider all relevant inquiries with both internal OIR stakeholders and stakeholders external to OIR.

Simplification requirement:

What was the Insufficient and failed inquiries found in the internal assessment of the investigation at [location]. ...

Requirement Two as sent to the Office of Industrial Relations ... :

Highlighted Operational Training for the staff in the investigation, as noted in the letter from [Officer A] ...

This is in response to [Officer A's] stated notation in the Decision [complaint reference number] email:

As a result of your 5 August 2022 complaint, the subsequent internal assessment and your further complaint of 14 March 2022, ESO is working to remedy the issues highlighted in the findings. ESO inspectors involved in this matter will receive operational training to consolidate and improve their ability to scope out potential sources of evidence collection when attending to similar events in the future. Additional training will be provided to relevant staff in the conduct of internal assessments in accordance with the OIR customer complaint framework.

Simplification requirement:

Supply additional Operational Training/ Training Information/logged training/Evidence of training of ESO Inspectors in concerns to the Investigation at [location] to inspectors failed actions to this investigation.

This as noted by [Officer A's] statement, in the email response in which he/she stated of the **initial customer service complaint of 5 August 2020 was insufficient and failed to consider all relevant inquiries and as stated ESO inspectors involved in this matter will receive operational training to consolidate and improve their ability to scope out potential sources of evidence collection)**

Requirement Three as sent to the Office of Industrial Relations ... :

Reasons or documentation to verify [Officer A's] reasons for refusing re investigation and documentation of reasons why passage of time was used to refuse re-investigation.

This is in response to [Officer A's] Decision [complaint reference number] email stated notation:

I have determined that actions on findings of this assessment will be focused on opportunities for continuous improvement and accordingly, will not be re-opening the investigation into your original workplace complaint notified to the ESO in August 2022

Simplification requirement:

Detail/reasoning of [Officer A's] determination is the understanding of her refusal to reopen the investigation. What findings of the assessment and its finding of failures gave reason to refuse to reopen

26. I sought clarification regarding whether the applicant was proposing a new scope consisting of his questions under the three headings of 'Simplification requirement'.³⁷ The applicant advised that 'these questions are in conjunction with to the original Application'.³⁸
27. While an applicant is not expected to know how agency documents are stored, created, or named, or what kinds of documents agencies produce, the RTI Act requires an applicant to give sufficient information about the documents they are seeking to enable an officer of the agency to identify them. However, where the wording of the application

³⁷ Email dated 6 November 2024.

³⁸ Email dated 13 November 2024.

requires the intervention of the RTI decision-maker before the documents can be identified, it will most likely be noncompliant.

28. In terms of **'Requirement One ... [d]ocument containing the issues/errors (made by the investigators) noted into the findings of the internal assessment'**, I consider that this wording would require the RTI decision-maker to intervene and make enquiries about matters other than document creation and management. I consider that noncompliance arises due to the words **'[d]ocument containing the issues/errors'**. In this regard I note:
- Officer A's letter indicates that she considered a range of evidence.³⁹
 - It is not clear on the face of Officer A's letter which documents among this evidence **'contain[ed] the issues/errors'** that Officer A considered to be of sufficient probative and persuasive value to result in her findings.
 - The RTI decision-maker cannot ask Officer A questions of this nature. This is because the RTI Act does not give the applicant an opportunity to ask agency staff questions.
 - The RTI decision-maker could analyse the entire range of evidence mentioned in Officer A's letter, and attempt to independently verify or perhaps guess which documents **'contain[ed] the issues/errors'**.
 - Alternatively, the RTI decision-maker could step into the shoes of Officer A and effectively make their own determination about which documents **'contain[ed] the issues/errors'** that led to Officer A's findings. In other words, the RTI decision-maker could undertake a subjective assessment and, in doing so, revisit or 'retry' the internal review in place of Officer A.
 - In either instance, however, this would extend beyond making enquiries to locate documents that have been sufficiently identified by the applicant, and comprise investigative and analytical intervention by the decision-maker.
29. To the best of my understanding, **'Requirement Two ... Highlighted Operational Training for the staff in the investigation, as noted in the letter from [Officer A] ... Supply additional Operational Training/ Training Information/ logged training/ Evidence of training of ESO Inspectors in concerns to the Investigation at [location] to inspectors failed actions to this investigation'** raises a similar concern. I take it that this wording would require the RTI decision-maker to differentiate between what training has been specifically provided to ESO inspectors as a result of Officer A's internal review findings, as opposed to training that might have been provided for other reasons. This would, in my opinion, also necessitate intervention by the RTI decision-maker and my comments, as set out in the previous paragraph, are apposite.
30. In terms of **'Requirement Three ... Reasons or documentation to verify [Officer A's] reasons for refusing re investigation and documentation of reasons why passage of time was used to refuse re-investigation'**, I consider that this wording again raises similar concerns. The RTI Act does not enable the applicant to require Officer A to provide reasons, and identifying documents relevant to Officer A's conclusion would require the RTI decision-maker to intervene. My comments at paragraph 28 are again apposite.
31. Finally, in terms of the questions posed in the **'Simplification requirement'** for Requirements One, Two and Three as set out at paragraph 255, the RTI Act does not give an applicant a right to be given answers to questions. It only gives them a right to be given access to documents.⁴⁰ This is stated in the RTI Act – for example, section 3(1) which provides that the primary object of the Act **'is to give a right of access to information in the government's possession ...'** and section 23(1)(a) which gives an individual **'a right**

³⁹ See the two paragraphs on page 3 of her letter under the heading **'Evidence considered'**.

⁴⁰ This right is, of course, subject to the limitations and exceptions in the RTI Act.

to be given access under this Act to documents of an agency'.⁴¹ Provisions throughout the RTI Act are expressed with this premise in mind.

32. For these reasons, I find that the application does not comply with the requirement to give sufficient information concerning the requested documents to enable a responsible officer of the agency or Minister to identify them.⁴²

DECISION

33. For the reasons set out above, I affirm OIR's decision and decide that OIR was entitled to refuse to deal with the access application under section 33(6) of the RTI Act on the basis that it does not give sufficient information concerning the requested documents to enable OIR to identify them as required by section 24(2)(b) of the RTI Act, and therefore does not comply with all relevant application requirements.
34. I have made this decision as a delegate of the Information Commissioner, under section 145 of the RTI Act.

A Rickard
Assistant Information Commissioner

Date: 12 March 2025

⁴¹ The underlining is my emphasis.

⁴² Section 24(2)(b) of the RTI Act.

APPENDIX

Significant procedural steps

Date	Event
7 June 2024	OIC received the application for external review from the applicant.
10 June 2024	OIC requested and received the preliminary documents from OIR.
24 June 2024	OIC received a submission from the applicant.
26 June 2024	OIC proposed an application scope to the applicant.
30 June 2024	OIC received a submission from the applicant which commented on the proposed scope.
2 July 2024	OIC wrote to the applicant about the proposed scope.
5 July 2024	OIC received a submission from the applicant which commented on the proposed scope. OIC wrote to the applicant about the proposed scope.
21 August 2024	OIC provided an update to OIR.
22 August 2024	OIC received submissions from OIR.
16 September 2024	OIC proposed a further application scope to the applicant. OIC received an email from the applicant.
17 September 2024	OIC advised the applicant that he had not attached a response to his email. OIC received a submission from the applicant which commented on the proposed scope.
19 September 2024	OIC proposed a further application scope to the applicant. OIC received submissions from the applicant, in which the applicant requested a response from OIC by the end of the day.
20 September 2024	OIC advised the applicant that it would respond when his submissions had been considered.
15 October 2024	OIC confirmed acceptance of the external review application and conveyed a preliminary view to the applicant. OIR provided an update to OIR.
27 October 2024	OIC received submissions from the applicant.
29 October 2024	OIC received correspondence from OIR.
6 November 2024	OIC responded to the applicant about his submissions. OIC responded to OIR's correspondence.
13 November 2024	OIC received correspondence from the applicant.