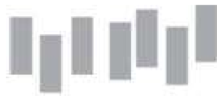

Office of the Information Commissioner
Queensland

Decision and Reasons for Decision

Citation:	***R76 and Gold Coast Hospital and Health Service* [2020] QICmr 29 (26 May 2020)**
Application Number:	**314770**
Applicant:	**R76**
Respondent:	**Gold Coast Hospital and Health Service**
Decision Date:	**26 May 2020**
Catchwords:	**ADMINISTRATIVE LAW - RIGHT TO INFORMATION - REFUSAL TO DEAL WITH APPLICATION - SUBSTANTIAL AND UNREASONABLE DIVERSION OF RESOURCES - documents relating to the applicant's interactions with the agency - whether dealing with the access application would substantially and unreasonably divert agency resources from their use in performing its functions - sections 60 and 61 of the *Information Privacy Act 2009* (Qld)**

REASONS FOR DECISION

Summary

1. The applicant applied[1] to the Gold Coast Hospital and Health Service (**GCHHS**) under the *Information Privacy Act 2009* (Qld) (**IP Act**) for access, between 1 August 2014 and 10 July 2019, to:

   - *Any letter or email about* [her] *sent to or by:* [GCHHS employees AD, JW, MS, BM, GQ, SC, NG and CO]*;* [(**Item One**)]
   - *The full names of persons who created warnings or alerts about* [her] *on* [her] *electronic medical record (eMR);* [(**Item Two**)]
   - *All current warnings and alerts about* [her] *on* [her] *electronic medical record (eMR), including the full names of corresponding authors;* [(**Item Three**)] *and*
   - *A list of dates on which* [GCHHS employees AD, CG or MS] *accessed* [her] *electronic medical record (eMR)* [(**Item Four**)]

2. After consulting[2] with the applicant about the scope of her access application, GCHHS decided[3] to refuse to deal with Item One of the access application[4] on the basis that

[1] Access application dated 10 July 2019.
[2] By letter dated 5 August 2019.
[3] Decision dated 12 August 2019.
[4] GCHHS's letter attaching the decision notice dated 12 August 2019 stated: *'… please find enclosed a decision notice issued under s 60 of the IP Act in relation to Item One of the Application…**Please note I will be sending you a separate decision letter in relation to Items Two, Three and Four of the Application shortly.**'*

doing so would substantially and unreasonably divert GCHHS's resources from their use in the performance of its functions.

3. The applicant applied[5] to the Office of the Information Commissioner (**OIC**) for external review of GCHHS's decision.

4. For the reasons set out below, I vary GCHHS's decision by finding that dealing with the entirety of the access application would substantially and unreasonably divert GCHHS's resources from their use in the performance of its functions.

Preliminary Issue - Alleged bias

5. The applicant has requested that I be removed from her matters[6] and alleged that I have an undisclosed bias against her.[7] I have issued a number of decisions involving the same applicant in which she has raised this issue.[8] As I have done on each occasion, I have carefully considered these submissions (which have not altered between reviews), alongside the High Court's test for assessing apprehended bias for a decision maker. The High Court's test requires consideration of *'if a fair-minded lay observer might reasonably apprehend that the judge might not bring an impartial and unprejudiced mind to the resolution of the question the judge is required to decide'*.[9] The High Court has also noted that '[t]*he question of whether a fair-minded lay observer might reasonably apprehend a lack of impartiality with respect to the decision to be made is largely a factual one, albeit one which it is necessary to consider in the legal, statutory and factual contexts in which the decision is made'.*[10]

6. OIC is an independent statutory body that conducts merits review of government decisions about access to, and amendment of, documents. The procedure to be followed on external review is, subject to the IP Act, within the discretion of the Information Commissioner.[11] In order to ensure procedural fairness (as required by both the IP Act[12] and common law), it is the practice of OIC to convey a preliminary view, based on an assessment of the material before the Information Commissioner or her delegate at that time, to an adversely affected party. This appraises that party of the issues under consideration and affords them the opportunity to put forward any further information they consider relevant to those issues.

7. During this external review, I conveyed[13] a preliminary view to the applicant that dealing with her access application would substantially and unreasonably divert GCHHS's resources from their use in the performance of its functions, and that GCHHS may therefore refuse to deal with the access application. My letter advised the applicant that the purpose of my view was to give her the opportunity to put forward her submission in reply, and if she provided additional information supporting her case, this would be considered and could alter the outcome.[14]

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[5] Application for external review dated 13 August 2019.
[6] Emailed submission dated 27 February 2020.
[7] Emailed submission dated 12 March 2020.
[8] I have not identified the previous decisions as the applicant was deidentified in those decisions. To list the previous decisions would defeat the purpose of that deidentification.
[9] *Ebner v Official Trustee in Bankruptcy* (2000) 205 CLR 337 at [6] per Gleeson CJ, McHugh, Gummow and Hayne JJ. See also *Michael Wilson & Partners Limited v Nicholls* (2011) 244 CLR 427 at [31] per Gummow ACJ, Hayne, Crennan and Bell JJ.
[10] *Isbester v Knox City Council* (2015) 255 CLR 135 at [20] per Keifel, Bell, Keane and Nettle JJ.
[11] Section 108 of the IP Act.
[12] Section 110 of the IP Act.
[13] Letter to applicant dated 25 February 2020.
[14] Footnote 1 of letter to applicant dated 25 February 2020.

8. For this decision, I am the delegate of the Information Commissioner.[15] I have not to my knowledge dealt with the applicant in any capacity prior to her reviews, and cannot identify any conflict of interest in my dealing with her application for review of GCHHS's decision refusing to deal with her access application. I do not consider the fact that the applicant has asked for me to be removed from her matters has altered my conduct of the review or consideration of the issues before me in any way. In these circumstances, paraphrasing the High Court's test, I am unable to identify any basis for finding that a fair-minded lay observer might reasonably apprehend that I[16] might not bring an impartial and unprejudiced mind to the resolution of this matter. Accordingly, I have proceeded to make this decision.

Background

9. After receiving the applicant's application for external review, OIC undertook preliminary inquiries[17] with GCHHS about the processing of the access application, including seeking copies of the procedural documents. Documents provided[18] in response by GCHHS revealed that GCHHS purported to issue two decisions on the access application, the first refusing to deal with Item One of the access application as set out at paragraph 2 above, and the second[19] refusing access to documents responding to the remaining items sought on the basis that the requested documents were non-existent.

10. In seeking an external review, the applicant also contended[20] that GCHHS had failed to conduct all reasonable searches for documents responding to Items Two, Three and Four of the access application.

11. Under section 65 of the IP Act, once GCHHS issued its first decision notice on 12 August 2019, GCHHS's decision-making power was spent and there was no statutory power for GCHHS to issue the second decision notice on 13 August 2019. Therefore, OIC advised[21] the applicant and GCHHS that as both decision notices related to the one access application, OIC would only be progressing an external review in relation to the decision dated 12 August 2019.

12. Significant procedural steps taken during the external review are set out in the Appendix.

Reviewable decision

13. The decision under review is GCHHS's decision dated 12 August 2019.

Evidence considered

14. The applicant provided extensive submissions during the review. I have considered all this material and have relied upon those parts which have relevance to the issues to be determined in this external review.

15. The submissions, evidence, legislation and other material considered in reaching this decision are referred to in these reasons (including footnotes and Appendix).

[15] Section 139 of the IP Act.
[16] As a delegate of the Information Commissioner under section 139 of the IP Act.
[17] By email dated 16 August 2019.
[18] On 16 August 2019.
[19] Dated 13 August 2019.
[20] Application for external review dated 13 August 2019.
[21] Letters dated 11 September 2019.

16. In reaching my decision, I have also had regard to the *Human Rights Act 2019* (Qld) (**HR Act**),[22] particularly the right to seek and receive information as embodied in section 21 of the HR Act. I consider that a decision-maker will, when observing and applying the law prescribed in the IP Act, be '*respecting and acting compatibly with*' this right and others prescribed in the HR Act.[23] I further consider that, having done so when reaching my decision, I have acted compatibly with and given proper consideration to relevant human rights, as required under section 58(1) of the HR Act. I also note the observations made by Bell J on the interaction between the Victorian equivalent of Queensland's IP Act and HR Act: '*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.'[24]

Issue for determination

17. On external review, the Information Commissioner, or her delegate, stands in the shoes of the decision-maker and looks at the whole matter afresh.[25] The issue for determination is whether GCHHS can refuse to deal with the *whole* access application on the basis that the work involved in dealing with the access application would, if carried out, substantially and unreasonably divert GCHHS's resources.[26]

Relevant law

18. Under the IP Act, an agency may refuse to deal with an access application if the agency considers the work involved in dealing with the application would, if carried out, substantially and unreasonably divert the resources of the agency from their use by the agency in the performance of its functions.[27]

19. In deciding whether an agency may refuse to deal with an application on the basis that doing so would substantially and unreasonably divert the resources of the agency from their use by the agency in the performance of its functions, I must have regard to the resources that would be used for:[28]

    - identifying, locating or collating the documents
    - making copies, or edited copies of any documents
    - deciding whether to give, refuse or defer access to any documents, including resources that would have to be used in examining any documents or conducting third party consultations; or
    - notifying any final decision on the application.

20. Assessing whether the work involved in processing a given application would, if carried out, substantially and unreasonably divert resources is a question of fact to be appraised in each individual case, taking into account a given agency's operations (other than IP Act processing) and resources.[29] Neither of the terms 'substantial' or 'unreasonable' are defined in the RTI Act, and are therefore to be accorded their ordinary meanings.

21. The power to refuse to deal with an application under section 60 of the IP Act can only be exercised if an applicant has first been given an opportunity to narrow the scope of

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[22] Which came into force on 1 January 2020.
[23] See *XYZ v Victoria Police (General)* [2010] VCAT 255 (16 March 2010) (**XYZ**) at [573]; and *Horrocks v Department of Justice (General)* [2012] VCAT 241 (2 March 2012) at [11].
[24] *XYZ* at [573].
[25] Section 118(1) of the IP Act.
[26] Under section 60 of the IP Act on the basis that this provision applies in respect of the whole of the access application.
[27] Section 60 of the IP Act.
[28] Section 60(2) of the *Right to Information Act 2009* (Qld) (**RTI Act**).
[29] *Davies and Department of Prime Minister and Cabinet* [2012] AICmr 10 (22 February 2012) at [23] and [28].

the application, so as to re-frame it into a form that can be processed by an agency.[30] An applicant is to be given the benefit of any information an agency may be able to supply to help with this narrowing process, as far as is reasonably practicable.

Findings

Requirement to consult

22. I have read GCHHS's notice[31] to the applicant (**Notice**). The Notice stated an intention to refuse to deal with the access application and advised the applicant that she had until a specified date[32] to consult with a view to making the access application in a form that would remove this ground as a basis for refusing to deal with the access application. GCHHS's Notice also stated the applicant may give written notice confirming or narrowing the scope of the access application and, if the applicant did not respond, she would be taken to have withdrawn the application. Considering the content of the Notice, I am satisfied that the Notice complied with the requirements of the IP Act.

23. I note that GCHHS's Notice also explained to the applicant some ways that she could change her application to make it manageable, including:

    - narrowing the date range for Item One to a period of 12 months;
    - narrowing Item One to only include correspondence sent by email;
    - specifying the search terms to be used in any IT searches to the applicants first and last name, rather than first and/or last names; and
    - limiting the individuals named in Item One, for example, by only including one or two clinicians.

24. In relation to processing the access application, GCHHS's Notice stated:

    - as the IT searches to retrieve electronic documents needed to include as search terms the applicant's first and/or last names, the IT searches were likely to return a significant volume of material that was not within scope of the access application
    - it was estimated that it would take in excess of 38 hours (being approximately 5.3 work days)[33] to download and review documents located as a result of the broad IT searches
    - responsive documents were likely to contain third party information which may have triggered the requirement to consult under section 56 of the IP Act
    - responsive documents were likely to contain information that may have required careful assessment and redaction; and
    - given the five year time frame, and the reference in Item One to 'letters', a large volume of responsive documents may have been archived and it was estimated that the time required to access and restore those documents would be in excess of 30 days, which equated to at least 214 hours.[34]

25. In response to the Notice, the applicant stated:[35]

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[30] Section 61 of the RTI Act.
[31] By letter dated 5 August 2019.
[32] Stated in the Notice as 19 July 2019. The applicant's emailed response to the Notice on 5 August 2019 at 12:35 pm stated *'There will be no submissions from me as you were told in the application, so provide your final decision today'*, I do not consider that there was a need for GCHHS to provide the applicant with an amended date for expiration of the prescribed consultation period.
[33] Based on a 7.15 hour work day.
[34] Based on a 7.15 hour work day.
[35] Email to GCHHS dated 5 August 2019 at 12:35 pm.

> *Send through the final decision today so OIC can begin review. You were told in advance there would be no further consultation or extension.*
>
> *The IP applicant* [sic] *would require a maximum of one hour only of searches.*
>
> *Previously you supplied only one of two documents at most per clinician named. You have only half a dozen listed here to search.*
>
> *When I made my application I refused consultation.*
>
> *I am entitled to around 20 hours of searches and repeatedly you refuse to even do an hour of searches …*
>
> *This IP decision was due on 13/8/19.*
>
> *There will be no submissions from me as you were told in the application, so provide your final decision today.*

26. In relation to Item One of the access application, GCHHS has provided the applicant with information about the searches that GCHHS would be required to undertake to locate documents and suggested to the applicant ways in which Item One could be narrowed to enable GCHHS to process her request. I therefore find that, as far as was reasonably practicable, GCHHS gave provided the applicant with an opportunity to narrow the scope of Item One of the access application, so as to re-frame it into a form that GCHHS could process.

27. In relation to Items Two and Three of the access application, I acknowledge that the applicant was not given an opportunity to narrow the scopes of those items so as to re-frame them into a form that could be processed by GCHHS. However, I also acknowledge that, as set out at paragraph 9 above, GCHHS purported to decide to refuse access to documents responding to Items Two and Three on the basis that the requested documents were non-existent.

28. In the circumstances of this matter, I do not consider it is necessary to provide the applicant with a further opportunity to narrow the terms of the application in relation to Items Two and Three of the access application when GCHHS has already indicated that the requested documents are non-existent and when I am satisfied that processing Item One of the access application on its own would result in a substantial diversion of GCHHHS's resources as set out below.

Work required to process the access application

29. GCHHS's Notice estimated that it would take in excess of 38 hours (being approximately 5.3 work days)[36] to download and review documents located as a result of the broad IT searches required to be undertaken in response to Item One of the access application. Further, given the five year time frame, and the reference in Item One to 'letters', GCHHS's Notice indicated that a large volume of responsive documents may have been archived and it is estimated that the time required to access and restore these documents would be in excess of 30 days, which equates to at least 214 hours.[37]

[36] Based on a 7.15 hour work day.
[37] Based on a 7.15 hour work day.

30. In response to the Notice, the applicant submitted:[38]

> *The IP applicant [sic] would require a maximum of one hour only of searches.*
> *…*
> *I am entitled to around 20 hours of searches and repeatedly you refuse to even do an hour of searches …*

31. The applicant also submitted:[39]

> *This would total under thirty pages.*
>
> *The IT officer can easily retrieve from an audit the whole data of who saw what and when in my records.*
>
> *In other hospitals the entire personal data is given in one application decision.*
>
> *GCHHS released four pages only in the last 12 months.*
>
> *I am entitled to 80 hours. You now took a year since the original application to produce nothing just to conceal crimes against me by medical staff. In context you also refused a review of my medical records because I applied two days late and despite serious illness and disability.*
>
> *Take into account that GCHHS uses an external law firm and is deceitful. Take into account their billion dollar operating budget.*
>
> *Speed up your decision. You just wasted a year knowing this information was needed specifically for human rights complaints.*
>
> *If I ask for these items one at a time, they will turn up less than two pages.*
>
> *Could you escalate this complaint to the CEO*
>
> *No further submissions*

32. While I acknowledge the applicant's concerns about the reasons for GCHHS's decision to refuse to deal with her access application, there is no evidence before me to suggest that GCHHS's reasons for its decision is *'deceitful'* or that GCHHS is *'concealing crimes'* against the applicant. Further, it is unclear to me why the applicant states that she is *'entitled to around 20 hours of searches'* or, alternatively, *'entitled to 80 hours'* of searches.

33. I do not consider that searches for documents responsive to the access application could be conducted in only one hour, 20 hours or 80 hours to which the applicant variously contends she is entitled. Rather, GCHHS's estimates of the time it would take to conduct IT searches and review documents located as a result of those searches or to access and restore documents which have been archived appear reasonable in the circumstances given GCHHS is the administrator, creator and keeper of the documents to which the applicant seeks access and is therefore well placed to provide a credible estimate.

Substantial

34. In relation to the question of whether the work involved in processing the access application would be substantial, I am satisfied that requiring GCHHS to commit at least

[38] Email to GCHHS dated 5 August 2019 at 12:35 pm.
[39] Emailed submission dated 26 February 2020 at 3:40am.

252 hours would comprise a substantial, or 'considerable' and 'telling',[40] diversion of GCHHS's resources, particularly given that GCHHS's staff who process IP and RTI applications within the Information & Access Services and Legal Services units would be diverted from working on other access applications during that time as well as from their other day to day work.

35. In this regard, I note the observations of Senior Member Puplick of the Administrative Appeals Tribunal, in considering the equivalent Commonwealth test:[41]

> *[101] … for any agency,* ***a burden in excess of 200 hours would almost certainly make the threshold of a rational and objective test****. …burdens as (relatively) small as 74 hours have been so characterised*.' (Emphasis added.)

36. I agree. In this matter, there is nothing before me to cause me to doubt GCHHS's estimate that processing the access application would require GCHHS to commit at least 252 hours, and I accept it as accurate. Conducting the searches required to process the access application alone would, on this figure take a GCHHS staff member just short of 7 weeks (approximately two and a half months) of full time effort, diverting limited staffing resources, including the staff members within the Legal Services unit who hold an RTI/IP delegation, from other RTI and IP access applications as well as from their other day to day work. This would place substantial strain on GCHHS's resources, a burden that, in the circumstances of these matters, I consider would also be unreasonable.

Unreasonable

37. As for the question of "reasonableness", there are a number of factors that may be relevant in determining reasonableness when assessing the potential resourcing burden imposed by an IP access application:[42]

> *(a) whether the terms of the request offers a sufficiently precise description to permit the agency, as a practical matter, to locate the documents sought within a reasonable time and with the exercise of reasonable effort*
>
> *(b) the public interest in disclosure of documents relating to the subject matter of the request*
>
> *(c) whether the request is a reasonably manageable one, giving due but not conclusive, regard to the size of the agency and the extent of its resources usually available for dealing with access applications*
>
> *(d) the agency's estimate as to the number of documents affected by the request, and by extension the number of pages and the amount of officer time, and the salary cost*
>
> *(e) the reasonableness or otherwise of the agency's initial assessment and whether the applicant has taken a cooperative approach in redrawing the boundaries of the application*
>
> *(f) the timelines binding on the agency*
>
> *(g) the degree of certainty that can be attached to the estimate that is made as to the documents affected and hours to be consumed; and in that regard, importantly*

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[40] '*Substantial*' is defined as meaning '*considerable amount, quantity, size, etc.:* a substantial sum of money' (Macquarie Dictionary, Fifth Edition) and '*of telling effect:* a substantial reform' (Collins Dictionary, 3rd Australian Edition).

[41] *VMQD and Commissioner of Taxation (Freedom of information)* [2018] AATA 4619 (17 December 2018). The Commonwealth *Freedom of Information Act 1982* permits an agency to refuse to deal with an application where a 'practical refusal reason' exists. A 'practical refusal reason' exists where the work involved in processing the request would 'substantially and unreasonably divert the agency's resources from its other operations': section 24AA(1)(a) of that Act.

[42] *Marigliano and Tablelands Regional Council* [2018] QICmr 11 (15 March 2018) (***Marigliano***), at [30] citing *Smeaton v Victorian WorkCover Authority (General)* [2012] VCAT 1550 (29 October 2012) at [39], adapting the factors listed in *Cianfrano v Premier's Department* [2006] NSWADT 137 at [62] to [63], the latter cited in *Zonnevylle v Department of Education and Communities* [2016] NSWCATAD 49 at [29]. The factors are not exhaustive.

whether there is a real possibility that processing time may exceed to some degree the estimate first made; and

(h) whether the applicant is a repeat applicant to that agency, and the extent to which the present application may have been adequately met by previous applications to the agency.

38. I acknowledge that previous matters dealt with by OIC have considered the issue of RTI/IP staff availability vis a vis the number of full time equivalent staff employed by an agency when considering the issue of whether the work involved in processing an application would be substantial. However, in this case there are very few staff available to undertake the processing of the RTI/IP applications of the GCHHS and while there are thousands of staff members employed at the GCHHS, only a handful are available for dealing with RTI and IP Act applications, the remainder being mostly devoted to the provision of the GCHHS' core function – healthcare. Thus, while the health service as a whole may have a large number of staff, in this case I consider it inappropriate to take that number of staff into account when determining whether processing the application would amount to a substantial and unreasonable diversion of GCHHS's resources. Each case turns on its own facts and, in this case, the estimated processing time of at least 252 hours is considerably more than the amount of time considered in a number of previous OIC decisions to amount to a substantial and unreasonable diversion of resources.[43] Further, as set out at paragraph 35 above, I consider that the burden that would be placed on GCHHS's limited staffing resources available for processing RTI and IP Act applications if GCHHS was to process the access application would be unreasonable.

39. In addition, while the applicant has been provided with an opportunity to redraw the boundaries of the application, the applicant has not taken a cooperative approach to reframing the scope of the application, as demonstrated by the applicant's submissions set out at paragraphs 30 and 31 above.

40. In conclusion, I find that the size and scope of the access application is alone sufficient to justify a finding that processing the application would be an exorbitant and excessive,[44] and therefore unreasonable, diversion of GCHHS's resources.

DECISION

41. For the reasons set out above, I vary GCHHS's decision and find that GCHHS was entitled to refuse to deal with the access application on the basis that dealing with the access application would substantially and unreasonably divert GCHHS's resources from their use in the performance of its functions.

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[43] See *Seal and Queensland Police Service* (Unreported, Queensland Information Commissioner, 29 June 2007); *Thomson and Lockyer Valley Regional Council* (Unreported, Queensland Information Commissioner, 23 September 2010); *Middleton and Building Services Authority* (Unreported, Queensland Information Commissioner, 24 December 2010); *Middleton and Department of Environment and Resource Management* (Unreported, Queensland Information Commissioner, 30 May 2011); *Mathews and University of Queensland* (Unreported, Queensland Information Commissioner, 5 December 2011); *Treasury Department (Fourth Party)* (Unreported, Queensland Information Commissioner, 9 May 2012); *Mewburn and Department of Natural Resources and Mines* [2016] QICmr 31 (19 August 2016); *ROM212 and Queensland Fire and Emergency Services* [2016] QICmr 35 (9 September 2016); *F60XCX and Office of the Queensland Parliamentary Counsel* [2016] QICmr 42 (13 October 2016); *Underwood and Department of Housing and Public Works* [2016] QICmr 48 (9 December 2016) (which was the subject of an appeal by the applicant to QCAT; however the applicant withdrew this application); *Angelopoulos and Mackay Hospital and Health Service* [2016] QICmr 47 (8 November 2016); and *60CDYY and Department of Education and Training* [2017] QICmr 52A (7 November 2017).

[44] '*Unreasonable*' is relevantly defined as meaning '*exceeding the bounds of reason; immoderate; exorbitant'* (Macquarie Dictionary, Fifth Edition) and '*immoderate; excessive:* unreasonable demands' (Collins Dictionary, 3rd Australian Edition).

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

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Assistant Information Commissioner Corby

Date: 26 May 2020

APPENDIX

Significant procedural steps

Date	Event
13 August 2019	OIC received the applicant's application for external review.
14 August 2019	OIC received an emailed submission from the applicant.
16 August 2019	OIC notified GCHHS and the applicant that the application for external review had been received and requested procedural documents from GCHHS. OIC received the requested procedural documents from GCHHS.
23 August 2019	OIC received an emailed submission from the applicant.
26 August 2019	OIC received an emailed submission from the applicant.
27 August 2019	OIC received an emailed submission from the applicant.
28 August 2019	OIC received two emailed submissions from the applicant.
5 September 2019	OIC received further procedural documents from GCHHS.
9 September 2019	OIC received an emailed submission from the applicant.
11 September 2019	OIC received an emailed submission from the applicant.
12 September 2019	OIC notified GCHHS and the applicant that the application for external review had been accepted. OIC received three emailed submissions from the applicant.
13 September 2019	OIC received an emailed submission from the applicant.
17 September 2019	OIC received an emailed submission from the applicant.
19 September 2019	OIC received an emailed submission from the applicant.
25 September 2019	OIC wrote to the applicant about her external reviews.
26 September 2019	OIC received an emailed submission from the applicant.
11 February 2020	OIC received further procedural documents from GCHHS.
25 February 2020	OIC conveyed a preliminary view to the applicant.
26 February 2020	OIC received two emailed submissions from the applicant.
27 February 2020	OIC received an emailed submission from the applicant.
5 March 2020	OIC received an emailed submission from the applicant.
11 March 2020	OIC wrote to the applicant about her external review applications.
12 March 2020	OIC received an emailed submission from the applicant.