



Decision and Reasons for Decision

Citation: *P17 and Queensland Corrective Services [2020] QICmr 68*
(17 November 2020)

Application Number: 315046

Applicant: P17

Respondent: Queensland Corrective Services

Decision Date: 17 November 2020

Catchwords: ADMINISTRATIVE LAW - RIGHT TO INFORMATION - REFUSAL OF ACCESS - EXEMPT INFORMATION - PREJUDICE SYSTEM OR PROCEDURE - offender management system documents - risk assessment information - whether disclosure could reasonably be expected to prejudice a system or procedure for the protection of persons - whether information is exempt under schedule 3 section 10(1)(i) of the *Right to Information Act 2009* (Qld) - whether access may be refused under section 67(1) of the *Information Privacy Act 2009* (Qld) and section 47(3)(a) of the *Right to Information Act 2009* (Qld)

ADMINISTRATIVE LAW - RIGHT TO INFORMATION - REFUSAL OF ACCESS - CONTRARY TO PUBLIC INTEREST INFORMATION - information identifying and relating to other individuals - personal information and privacy - whether disclosure would, on balance, be contrary to the public interest - whether access may be refused under section 67(1) of the *Information Privacy Act 2009* (Qld) and section 47(3)(b) of the *Right to Information Act 2009* (Qld)

ADMINISTRATIVE LAW - RIGHT TO INFORMATION - REFUSAL OF ACCESS - NONEXISTENT OR UNLOCATABLE DOCUMENTS - applicant raised concerns about missing information and recordkeeping - whether agency has taken reasonable steps to locate all relevant documents in response to the application - whether documents nonexistent or unlocatable - whether access to information may be refused under section 67(1) of the *Information Privacy Act 2009* (Qld) and section 47(3)(e) 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 all information held by QCS about her, including information relating to her 'accidental entry onto the prison system'.¹
2. QCS located the applicant's Integrated Offender Management System (**IOMS**) file and Central Archives file, comprising 304 pages. QCS released most of this information to the applicant² but decided to refuse access to certain information³ on the basis that it was exempt⁴ or because its disclosure would, on balance, be contrary to the public interest.⁵
3. The applicant applied to the Office of the Information Commissioner (**OIC**) for external review on the basis that QCS had 'failed to provide access to all documents requested' and raised concerns that QCS was 'unreasonably refusing to provide access to pertinent information'.⁶ The applicant also submitted to OIC that documents were missing. Initially, these concerns were focused on records of phone calls. However, as the review progressed, it became apparent that the applicant had more general concerns with the sufficiency of QCS' searches.
4. For the reasons set out below, I affirm QCS' decision to refuse access to certain information on the basis that it is exempt under schedule 3, section 10(1)(i) of the RTI Act and to the remaining information on the basis that disclosure would, on balance, be contrary to the public interest.⁷ I also find that QCS has taken all reasonable steps to locate documents in response to the application and that, therefore, access to any further information may be refused under section 47(3)(e) of the RTI Act.⁸

Background

5. Significant procedural steps relating to this review are set out in the Appendix.

Reviewable decision

6. The decision under review is QCS' decision dated 31 October 2019.

Evidence considered

7. Evidence, submissions, legislation and other material considered in reaching this decision are referred to in these reasons (including in the footnotes and the Appendix).
8. In reaching this decision, I have also had regard to the *Human Rights Act 2019* (Qld),⁹ particularly the applicant's right to seek and receive information.¹⁰ I consider a decision-maker will be 'respecting and acting compatibly with' that right and others prescribed in

¹ Access application dated 26 July 2019. The applicant was the subject of a community corrections (probation) order but was not incarcerated.

² 222 full pages and 81 part pages.

³ The remaining parts of 81 pages and 1 full page.

⁴ Section 47(3)(a) and section 48, and schedule 3, section 10(1)(i) of the *Right to Information Act 2009* (Qld) (**RTI Act**).

⁵ Section 47(3)(b) and section 49 of the RTI Act.

⁶ External review application received 27 November 2019.

⁷ Under section 67(1) of the IP Act and sections 47(3)(a) and (b) of the RTI Act.

⁸ And section 67(1) of the IP Act.

⁹ Referred to in these reasons as the **HR Act**, and which came into force on 1 January 2020.

¹⁰ Section 21 of the HR Act.

the HR Act, when applying the law prescribed in the RTI Act.¹¹ I have acted in this way in making this decision, in accordance with section 58(1) of the HR Act.

Information in issue

9. QCS refused access to the following information which remains in issue in this review:

- entries in the IOMS file relating to the applicant while under a probation order¹² (**Probation Information**)
- a court order¹³; and
- information about other individuals appearing in the IOMS file¹⁴ and a community supervision order (**Third Party Information**).¹⁵

Issues for determination

10. The applicant made extensive submissions in support of her right to access the refused information, about recordkeeping issues at QCS, and raised concerns about administrative errors and privacy.¹⁶ In summary, the applicant's key concerns include:

1. *Our client is seeking access to all of the redacted material on the basis that it is her personal information;*
2. *Our client has complained about her breach of privacy and medical records being released a number of times and has been told it is an administrative error ...*
3. *She holds ongoing concerns about two phone calls she received in May and June 2018 relating to prison transfer to hospital. These phone calls were from a hospital;*
4. *She has expressed concern about misuse of her personal information by QCS.*¹⁷

11. I acknowledge the applicant has faced challenges in her dealings with QCS and other government agencies in recent years.¹⁸ The functions of the Information Commissioner on external review are set out in section 137 of the IP Act¹⁹ and are limited to considering information access issues, and the reasonableness of an agency's searches. Therefore, these reasons only address issues that are within the Information Commissioner's external review jurisdiction, and accordingly, do not consider the applicant's submissions relating to the misuse of personal information or complaints about breaches of privacy, nor do they address any of the questions²⁰ raised by the applicant in her submissions.²¹

¹¹ XYZ v Victoria Police (General) [2010] VCAT 255 (16 March 2010) at [573]; Horrocks v Department of Justice (General) [2012] VCAT 241 (2 March 2012) at [111].

¹² Parts of pages 13-15, 17, 19-21, 28-31, 33-40, 46-47, 49, 56-62, 65-66, 68, 73-81, 83-87, 89-91, 94-96, 98-102, 104, 108-109, 112-116, 149-151, 154-155, 163, 185 and 190 of the IOMS file.

¹³ Page 40 of the Central Archives File.

¹⁴ Pages 10, 67, 69, 89, 93, 101, 193.

¹⁵ Pages 107-108 of the Central Archives File.

¹⁶ Submissions by the applicant's legal representative to OIC dated 16 January 2020, 12 February 2020, 29 March 2020, 12 July 2020, and by the applicant directly to OIC dated 18 April 2020, 23 April 2020 and 4 August 2020 and by telephone on 23 April 2020 and 20 May 2020.

¹⁷ Submission to OIC dated 12 July 2020 made by the applicant's legal representative.

¹⁸ Information relating to recordkeeping/administrative errors was disclosed to the applicant by QCS (IOMS File – pages 9, 16, 160, 165, 168, 170; and Central Archives File – pages 35-38). These pages reveal that the applicant's IOMS record was mistakenly changed to record her as being held in a correctional centre instead of remaining under a community corrections probation order. The records also reveal that the errors in IOMS were rectified, at the time, by QCS staff.

¹⁹ Namely, investigating and reviewing decisions of agencies made subject to external review and investigating and reviewing whether an agency has taken reasonable steps to identify and locate documents applied for by an applicant.

²⁰ It is well accepted that the information access regime set up under the IP Act and RTI Act does not give persons a legally enforceable right to obtain answers to questions, or to have a government agency extract answers to questions from documents in their possession: *Hearl and Mulgrave Shire Council* (1994) 1 QAR 557 at 30.

²¹ As set out in submissions dated 12 July 2020 and 4 August 2020.

12. In view of the above, the three issues to be determined are:
 - a. whether the Probation Information is exempt under schedule 3, section 10(1)(i) of the RTI Act on the basis that disclosure could reasonably be expected to prejudice a system or procedure for the protection of persons;
 - b. whether disclosure of the court order and the Third Party Information would, on balance, be contrary to the public interest; and
 - c. whether QCS has taken reasonable steps to locate all documents responding to the application.
13. To the extent the applicant's submissions relate to the above three issues, I have considered them below.

Relevant law

14. 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.²² However, this right is subject to other provisions of the legislation including the grounds on which access may be refused to information.²³
15. Access may be refused to exempt information.²⁴ Relevantly, schedule 3 of the RTI Act provides that information will be exempt if its disclosure could reasonably be expected to prejudice a system or procedure for the protection of persons, property or the environment.²⁵
16. Access to information may also be refused if its disclosure would, on balance, be contrary to the public interest.²⁶ In deciding where the balance of the public interest lies, the legislation requires a decision maker to identify relevant factors for and against disclosure²⁷ and decide, on balance, whether disclosure would be contrary to the public interest.²⁸
17. Access may also be refused to documents that are nonexistent.²⁹ A document will be nonexistent if there are reasonable grounds to be satisfied the document does not exist.³⁰ To be satisfied of this, a decision maker must rely on their particular knowledge and experience and have regard to a number of key factors.³¹ By considering those key factors, an agency may ascertain that a particular document was not created because, for example, the agency's processes do not involve creating that specific document. In such instances, it is not necessary for the agency to search for the document. Rather, it is sufficient that the relevant circumstances to account for the nonexistent document are adequately explained by the agency.

²² Section 40 of IP Act.

²³ Section 67(1) of the IP Act and section 47(3) of the RTI Act. Section 67(1) of the IP Act provides that access to information may be refused on the same grounds, as set out in section 47(3) of the RTI Act.

²⁴ Section 67(1) of the IP Act and sections 47(3)(a) and 48 of the RTI Act.

²⁵ Schedule 3, section 10(1)(i) of the RTI Act.

²⁶ Section 67(1) of the IP Act and sections 47(3)(b) and 49 of the RTI Act.

²⁷ And identify, and disregard, irrelevant factors.

²⁸ Section 49(3) of the RTI Act.

²⁹ Sections 47(3)(e) and 52(1) of the RTI Act.

³⁰ Section 52(1)(a) of the RTI Act.

³¹ *Pryor and Logan City Council* (Unreported, Queensland Information Commissioner, 8 July 2010) at [19] which adopted the Information Commissioner's comments in *PDE and the University of Queensland* (Unreported, Queensland Information Commissioner, 9 February 2009) (*PDE*) at [37]–[38]. The key factors include: the administrative arrangements of government; the agency structure; the agency's functions and responsibilities; the agency's practices and procedures and other factors including the nature and age of the requested document/s and the nature of the government activity to which the request relates.

18. An agency may also rely on searches to satisfy itself that a document does not exist. In those cases, reasonable steps must be taken to locate the documents.³² Such steps may include inquiries and searches of all relevant locations identified after consideration of the key factors.³³
19. Generally, on external review, the agency that made the decision under review has the onus of establishing that the decision was justified or that the Information Commissioner should give a decision adverse to the applicant.³⁴ However, where the issue of missing documents is raised, the applicant bears a practical onus to establish reasonable grounds to believe that the agency has not discharged its obligation to locate all relevant documents.³⁵

Findings

(a) Probation Information

20. Three elements must be satisfied for the exemption in schedule 3, section 10(1)(i) of the RTI Act to apply:
 - a. an identifiable system or procedure
 - b. a system or procedure for the protection of persons, property or the environment; and
 - c. disclosure of the information could reasonably be expected to prejudice that system or procedure.³⁶
21. In considering requirements (a) and (b), I have had regard to the *Penalties and Sentences Act 1992* (Qld) which provides for the making of probation orders in sentencing offenders in Queensland.³⁷ I am satisfied that probation is an identifiable system or procedure for the protection of persons (offenders and the community).³⁸
22. In evaluating requirement (c), I have considered the particular nature of the Probation Information and whether its disclosure could reasonably be expected to³⁹ prejudice the probation system.⁴⁰ I am limited by the IP Act from describing the content of refused information with any specificity.⁴¹ However, it generally comprises information that

³² As set out in *PDE* at [49]. See also section 130(2) of the RTI Act.

³³ Set out in footnote 31.

³⁴ Section 87(1) of the RTI Act.

³⁵ See *Mewburn and Department of Local Government, Community Recovery and Resilience* [2014] QICmr 43 (31 October 2014) at [13].

³⁶ As set out in *Ferrier and Queensland Police Service* (1996) 3 QAR 350 [27]-[36] under the equivalent provision in the repealed *Freedom of Information Act 1992* (Qld), and summarised in *I3C1ST and Department of Community Safety* (Unreported, Queensland Information Commissioner, 30 August 2011) at [12] in the context of the RTI Act.

³⁷ Part 5, Division 1 of the *Penalties and Sentences Act 1992* (Qld) (**PS Act**). The purposes of the PS Act include in section 3(b) 'providing for a sufficient range of sentences for the appropriate punishment and rehabilitation of offenders, and, in appropriate circumstances, ensuring that protection of the Queensland community is a paramount consideration'.

³⁸ The purposes of the PS Act include in section 3(b) 'providing for a sufficient range of sentences for the appropriate punishment and rehabilitation of offenders, and, in appropriate circumstances, ensuring that protection of the Queensland community is a paramount consideration'. See also: *Ross and Department of Justice and Attorney-General* [2017] QICmr 46 (14 September 2017) at 14-16.

³⁹ The meaning of the phrase 'could reasonably be expected to' has been considered by the Information Commissioner in a number of previous decisions. In essence the expectation of prejudice must be based in reason as distinct from something that is irrational, absurd or ridiculous: see *VHL and Department of Health* (Unreported, Information Commissioner of Queensland, 20 February 2009) at [51]-[53] accepting the interpretation offered in *Attorney-General v Cockcroft* (1986) 64 ALR 97 at 106. Most recently, see discussion of the phrase in *Byers and Department of Justice and Attorney-General* [2014] QICmr 34 (12 August 2014) at [31].

⁴⁰ I also consider that the Probation Information does not contain any information referred to in schedule 3, section 10(2) of the RTI Act, in accordance with *Commissioner of the Police Service v Shelton & Anor* [2020] QCA 96 at [47].

⁴¹ Section 121(3) of the IP Act.

assesses risk(s), recommendations made, and information obtained by QCS in relation to the management and monitoring of the applicant during the probation period.⁴²

23. I am satisfied that, if the Probation Information was disclosed, it would reveal the mechanisms and processes that QCS uses to assess and monitor offenders under a probation order. I consider it is reasonable to expect that this could result in offenders (generally) modifying their behaviour so as to avoid scrutiny by QCS. I am satisfied that this could reasonably be expected to prejudice the ability of QCS to effectively discharge its role in managing offenders under probation orders, pose an increased risk to the community if breaches went undetected, and result in an increased risk of offending if the offender is not appropriately rehabilitated through the probation process. I find that these outcomes could reasonably be expected to prejudice the probation system that is set up under the PS Act, thereby, satisfying requirement (c) of the exemption.⁴³
24. The applicant contests the application of the exemption on the basis that the Probation Information specifically relates to her and is of a private nature which warrants disclosure.⁴⁴ Where the requirements of an exemption are made out, I am unable to take submissions of this nature into account, as they seek to raise public interest considerations.⁴⁵ Parliament has already decided that all types of exempt information will be contrary to the public interest to disclose.⁴⁶
25. On the basis of the above, I find that the Probation Information is exempt under schedule 3, section 10(1)(i) of the RTI Act and therefore, access to it may be refused.⁴⁷

(b) Third Party Information and court order

26. In considering whether disclosure of the Third Party Information and the court order would, on balance, be contrary to the public interest, I have not taken any irrelevant factors into account.⁴⁸
27. There is a general public interest in promoting access to government-held information and I have taken this into account in relation to disclosure of the Third Party Information.⁴⁹ However, given the particular nature of the Third Party Information—it is about other people, and includes names, contact details, identification numbers, places of residence and in one instance, medical information—I am unable to identify any other factors favouring its disclosure. On the contrary, release of this information would disclose the personal information⁵⁰ of other individuals, and could reasonably be expected to intrude into the personal sphere of those third parties given the context in which it appears.⁵¹ On balance, I find that disclosure of the Third Party Information would be contrary to the public interest, and access to it may therefore be refused.⁵²

⁴² The applicant is aware of the information in the surrounding entries as the Probation Information comprises only part page redactions.

⁴³ I have considered whether the exception in schedule 3, section 10(2) of the RTI Act could apply to set aside the exemption. However, there is no evidence before me to indicate that the Probation Information comprises any of the types of information listed in schedule 3, section 10(2) of the RTI Act.

⁴⁴ Submission dated 12 July 2020. The applicant's legal representative conceded in this submission that exemptions are not subject to public interest factors, however, maintained that an overriding public interest should favour disclosure of information showing that the applicant's information had been 'mistaken' for that of another offender.

⁴⁵ However, to the extent the applicant's submissions relate to information to which access has been refused on public interest grounds, I have taken them into account below.

⁴⁶ Section 48(2) of the RTI Act.

⁴⁷ Section 67(1) of the IP Act and section 47(3)(a) of the RTI Act.

⁴⁸ Including those listed at schedule 4, part 1 of the RTI Act.

⁴⁹ As evidenced by section 64 of the IP Act, which sets out the pro-disclosure bias in deciding access to documents.

⁵⁰ Section 12 of the IP Act defines 'personal information' 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.'

⁵¹ Schedule 4, part 3, item 3 and schedule 4, part 4, section 6(1) of the RTI Act.

⁵² Under section 67(1) of the IP Act and section 47(3)(b) of the RTI Act.

28. In relation to the court order, it is *'about'* the applicant and therefore, a public interest factor in favour of disclosure applies.⁵³ The court order does not, however, detail any of QCS' actions or processes that were taken in relation to the applicant. Rather, it is a court generated document that forms part of the applicant's IOMS file as it relates to her interactions with the legal system in Queensland. Therefore, while I have considered whether disclosure could reasonably be expected to enhance QCS' accountability, inform the community of its operations or reveal background or contextual information that informed a QCS decision,⁵⁴ it provides limited insight into QCS' operations and I afford each of these factors low weight.
29. The applicant submits there has been a *'cover-up'* in relation to her information.⁵⁵ I have, therefore, considered whether disclosure could reasonably be expected to assist inquiry into possible deficiencies in QCS' conduct.⁵⁶ However, having considered the information contained in the court order, I do not consider there is any evidence to establish this factor, and therefore, I afford it no weight.
30. The applicant also submits that she requires information to pursue legal remedies.⁵⁷ However, given the content of the court order, I do not consider disclosure could reasonably be expected to advance her fair treatment in accordance with the law, reveal that any information was incorrect, or assist the applicant in evaluating the availability of any potential legal remedies.⁵⁸ As indicated above, the court document concerns a historical interaction the applicant had with the legal system which is held on her IOMS file. Accordingly, I do not consider these factors apply.
31. On the other hand, I am satisfied there are several public interest factors favouring nondisclosure of the court order, as it contains the personal information of another individual and relates to their private sphere.⁵⁹ Given the sensitive circumstances connected to the court order, I afford these factors significant weight. While I acknowledge that the applicant's personal information also appears, it is inextricably intertwined with the other individual's personal information and cannot be separated so as to allow disclosure of only the applicant's details.
32. On balance, I find that disclosure of the court order would be contrary to the public interest and therefore, access to it may be refused.⁶⁰

(c) Nonexistent documents

33. The applicant made extensive submissions⁶¹ about missing documents, deficiencies in QCS' recordkeeping practices and the negative impact that QCS' administrative errors have had on her wellbeing. The applicant is particularly concerned about records relating to *'accidental entry onto the prison system'* and phone calls she received (from Queensland Health) in 2018 seeking to arrange prison transport.⁶²
34. As noted in paragraph 11 above, some of the issues raised by the applicant are beyond the Information Commissioner's jurisdiction on external review. To the extent the

⁵³ Schedule 4, part 2, item 7 of the RTI Act.

⁵⁴ Schedule 4, part 2, items 1, 3 and 11 of the RTI Act.

⁵⁵ In submissions dated 4 August 2020.

⁵⁶ Giving rise to the factor under schedule 4, part 2, item 5 of the RTI Act.

⁵⁷ Submission to OIC dated 12 July 2020.

⁵⁸ Schedule 4, part 2, item 17 of the RTI Act.

⁵⁹ Schedule 4, part 3, item 3 and part 4, section 6 of the RTI Act.

⁶⁰ Section 67(1) of the IP Act and section 47(3)(b) of the RTI Act.

⁶¹ See footnote 16 above.

⁶² As set out in submissions dated 12 July 2020.

applicant's submissions are relevant to whether QCS has taken reasonable steps to locate the documents requested, I have considered them below.

35. QCS has provided OIC with records showing the searches that were conducted on the application resulting in the location of the IOMS file and Central Archives File, comprising just over 300 pages.⁶³ Those search records confirm that searches were conducted of QCS Central Archives and the Wynnum Community Corrections unit for all documents relating to the applicant.⁶⁴ QCS explained that it records all interactions with offenders (including those on probation) through the IOMS system. QCS also observed that the applicant completed the probation order in late 2016 and that *'No further documents have been saved within IOMS since this time'*.⁶⁵
36. The applicant's involvement with QCS relates to her period of probation.⁶⁶ QCS located and released most of the information located on two relevant files, detailing the various interactions between the applicant and QCS staff during her probation period. While the applicant contests QCS' position that nothing exists beyond 2016⁶⁷, consistent with QCS' observation above, I note that the released documents confirm the applicant was discharged from her community corrections order in late 2016.⁶⁸ On that basis, I consider it is reasonable to expect that communications between the applicant and QCS officers are unlikely to exist once she was discharged from the community corrections order.
37. I am satisfied that the search records provided by QCS demonstrate that QCS conducted searches in relevant areas, given the scope of the application. The search records also show that multiple officers were involved in searching electronic databases and hard copy files.⁶⁹ I am satisfied that these searches were comprehensive and targeted to areas where it would be reasonable to expect documents about an offender on probation would be located. As stated above⁷⁰, information about QCS' administrative errors was released to the applicant in multiple pages of the IOMS file.
38. With respect to the phone call records, I note that the applicant states she received these calls from Queensland Health, a separate government agency. It is reasonable to expect that records of phone calls made by a government agency would be created and retained only by that agency, unless there is evidence to suggest they were provided to another agency. Other than the applicant's assertions, I do not have any evidence that records of calls made by Queensland Health were provided, or are otherwise held, by QCS. Therefore, I do not consider it would be reasonable to ask QCS to conduct further searches for the phone call records sought by the applicant.
39. Given the scope of the application, the nature of the applicant's involvement with QCS, the released documents and QCS' searches, I consider all reasonable steps have been taken by QCS to locate documents that respond to the application. On that basis, I am satisfied that further documents do not exist and access to any further information may therefore be refused.⁷¹

⁶³ Submissions from QCS dated 11 May 2020.

⁶⁴ Search records provided to OIC on 11 May 2020 show that searches were conducted of electronic databases and hardcopy records.

⁶⁵ Submission to OIC dated 11 May 2020.

⁶⁶ Under the supervision and monitoring of the Wynnum Community Corrections unit.

⁶⁷ She submits that she had communication with QCS after that time: submission to OIC dated 12 July 2020.

⁶⁸ Page 188 of the IOMS File in a 1 page record titled *'Movement History'*.

⁶⁹ Using the applicant's name, date of birth and QCS identification number.

⁷⁰ See footnote 18 above.

⁷¹ Sections 67(1) of the IP Act and sections 47(3)(e) and 52(1)(a) of the RTI Act.

DECISION

40. I affirm QCS' decision to refuse access to the Probation Information on the basis that it is exempt and to the Third Party Information and court order on the basis that disclosure would, on balance, be contrary to the public interest.⁷² I also find that QCS has taken all reasonable steps to locate documents in response to the application and that therefore, access to any further information may be refused under section 47(3)(e) of the RTI Act⁷³ on the basis that it does not exist.
41. I have made this decision as a delegate of the Information Commissioner, under section 139 of the IP Act.

K Shepherd
Assistant Information Commissioner

Date: 17 November 2020

⁷² Sections 67(1) of the IP Act and sections 47(3)(a) and (b) of the RTI Act.

⁷³ And section 67(1) of the IP Act.

APPENDIX

Significant procedural steps

Date	Event
27 November 2019	OIC received the application for external review.
5 December 2019	OIC requested preliminary documents from QCS.
9 December 2019	OIC received the preliminary documents from QCS.
16 January 2020	OIC received an email from the applicant's representative.
30 January 2020	OIC advised the applicant and QCS that the application for external review had been accepted and requested a submission from the applicant, and the information in issue and search information from QCS.
5 February 2020	OIC received the information in issue and search information from QCS.
12 February 2020	OIC received a submission from the applicant's representative.
3 March 2020	OIC contacted QCS requesting further search information.
10 March 2020	OIC wrote to the applicant's representative confirming the scope of the review.
29 March 2020	OIC received a submission from the applicant's representative.
1 April 2020	OIC contacted QCS concerning the request for further search information and to seek a response on a sufficiency of search issue.
18 April 2020	OIC received two emails from the applicant concerning the review.
21 April 2020	OIC contacted QCS concerning the request for further search information. OIC wrote to the applicant to clarify the status and scope of the review.
23 April 2020	The applicant provided submissions to OIC by telephone and email. OIC wrote to the applicant to clarify the scope of the review.
7 May 2020	OIC contacted QCS concerning the request for further search information.
11 May 2020	OIC received search information from QCS.
14 May 2020	OIC contacted QCS seeking its consent to convey certain information to the applicant to assist informal resolution. QCS agreed to a form of words being provided to the applicant for this purpose.
20 May 2020	The applicant made submissions by telephone to OIC.
23 June 2020	OIC conveyed a written preliminary view to the applicant.
14 July 2020	The applicant's representative provided a submission to OIC, dated 12 July 2020, contesting the preliminary view.
3 August 2020	OIC wrote to the applicant to clarify the issues for determination.
4 August 2020	The applicant provided OIC with a further submission by email.
21 August 2020	OIC wrote to the applicant to confirm the status of the review.
16 October 2020	OIC wrote to the parties with an update on the next steps in the review.