



Decision and Reasons for Decision

Citation:	<i>M16 and Department of Education [2022] QICmr 36 (30 June 2022)</i>
Application Number:	315521
Applicant:	M16
Respondent:	Department of Education
Decision Date:	30 June 2022
Catchwords:	ADMINISTRATIVE LAW - RIGHT TO INFORMATION - REFUSAL OF ACCESS - DOCUMENTS NONEXISTENT OR UNLOCATABLE - whether agency has conducted reasonable searches - whether access to copies of audio recordings and related metadata and documents may be refused on the basis they are nonexistent or unlocatable - sections 48 and 67(1) of the <i>Information Privacy Act 2009</i> (Qld) - sections 47(3)(e) and 52(1) of the <i>Right to Information Act 2009</i> (Qld)

Summary

1. The applicant applied to the Department of Education (**Department**)¹ under the *Information Privacy Act 2009* (Qld) (**IP Act**) for access to:²

Part 1:

On [date] at [time] [the applicant] sent [sic] email to [the Principal] at [name of school] requesting amendments be made to some of [child of the applicant's] school records. Attached to that email was an audio recording. This email was then forwarded to staff in the [Area] Region and the audio recording was allegedly saved into TRIM.

The applicant is seeking access [sic] any documents held in relation to this email/recording. Including but not limited to;

- who received and/or sent that email/recording;
- any advice given or sought in relation to the recording or the amendment request;
- any transcript created of the recording and;
- any metadata relating to when and who has accessed the email/recording.

Part 2:

All documents held in relation to any complaints made by [the applicant]. Including but not limited to:

¹ On 21 January 2020.

² For the timeframe 1 March 2019 to 31 January 2020. The applicant and the Department agreed to the scope of the access application in emails dated 12 March 2020.

- Documents relating to the decision to refer complaints to [Area] Region for management;
 - Any recordings, including any provided by [the Applicant], as well as any transcripts of recordings;
 - All correspondence, including any email correspondence;
 - Any meeting notes and/or minutes; and
 - Any outcome memos and/or reports prepared.
2. The Department located 1,757 pages and four audio recordings and decided to³ grant full access to 1,463 pages and the four audio recordings. Access was refused to:
- parts of 247 pages, on the ground that disclosure would, on balance, be contrary to the public interest;⁴ and
 - 24 full pages and parts of 26 pages on the ground that the information comprises exempt information, specifically information the disclosure of which could reasonably be expected to prejudice the investigation of a contravention or possible contravention of the law in a particular case.⁵
3. The applicant applied to the Office of the Information Commissioner (**OIC**) for external review:⁶
- seeking access to the information that had been refused by the Department; and
 - contending that the Department had not taken all reasonable steps to locate documents relevant to his access application. In particular, that the Department had not located:
 - all copies of two audio recordings titled 'Re-entry 1' and 'Re-entry 2' (**Recordings 1 and 2**) attached to an email (**Email**) the applicant sent to the Principal and any metadata or other document in relation to those recordings; and
 - recordings of telephone conversations between the applicant and one of the Department's Investigators.
4. For the reasons set out below, I am satisfied that the Department has taken all reasonable steps to locate all copies of Recordings 1 and 2 and any metadata or document in relation to those recordings and accordingly, I vary the Department's decision and find that access may be refused to any further copies of Recordings 1 and 2 and any associated metadata or other document on the ground they are nonexistent.⁷

Background

5. The applicant's child was suspended from school. The applicant made complaints about the actions taken by various staff at the school and the information placed on the child's OneSchool⁸ record in relation to the suspension. Subsequently, the applicant emailed the Principal of the school, requesting that notations be made to certain OneSchool records that the applicant considered were not accurate. As noted at paragraph 3, the applicant contends that attached to the Email were Recordings 1 and 2. Recordings 1 and 2 comprise excerpts from a re-entry meeting that the applicant attended with the Acting Deputy Head of Department, in relation to the child's suspension.

³ On 26 June 2020.

⁴ Section 47(3)(b) of the *Right to Information Act 2009* (Qld) (**RTI Act**).

⁵ Section 48 and schedule 3, section 10(1)(a) of the RTI Act.

⁶ On 23 July 2020.

⁷ Pursuant to section 67(1) of the IP Act and sections 47(3)(e) and 52(1) of the RTI Act.

⁸ OneSchool is the Department's software, that is used by schools for reporting and administrative processes. See <[OneSchool and QParents \(education.qld.gov.au\)](https://www.education.qld.gov.au/OneSchool)>.

6. During the investigation of the applicant's complaints, the applicant provided the Department with four further audio recordings, titled 'Re-entry 4', 'Re-entry 6', 'Re-entry 7' and 'Re-entry 9' (**Recordings 4, 6, 7 and 9**), comprising further excerpts of the discussion that took place during the re-entry meeting.⁹ As noted at paragraph [2](#), the Department released these recordings to the applicant in full.
7. In a related external review with OIC, the Department located Recordings 1 and 2 and agreed to release these to the applicant in full.¹⁰ However, in this review, the applicant contends that not all copies of Recordings 1 and 2 and any related metadata or document has been located by the Department. He contends that Recordings 1 and 2 were sent to various persons and Units within the Department and documents should exist which demonstrate this. Essentially, the applicant is seeking to locate all documents evidencing the communicating or forwarding of Recordings 1 and 2 between staff of the Department and associated metadata.
8. During the external review the Department agreed to release to the applicant the information that it considered to be exempt information¹¹ and located and released the Department's recordings of telephone conversations between the applicant and one of the Department's Investigators.¹² Accordingly, these matters, having been resolved during the external review, will not be addressed in this decision except to the extent they are relevant to the issues considered below.
9. Significant procedural steps relating to the external review are set out in the Appendix.

Reviewable decision

10. The decision under review is the Department's decision dated 26 June 2020.

Evidence considered

11. The evidence, submissions, legislation and other material I have considered in reaching my decision are set out in these reasons (including footnotes and the Appendix). I have taken account of the applicant's submissions to the extent they are relevant to the issues for determination in this review.
12. I have also had regard to the *Human Rights Act 2019* (Qld) (**HR Act**), particularly the right to seek and receive information.¹³ I consider a decision-maker will be '*respecting, and acting compatibly with*' that right and others prescribed in the HR Act, when applying the law prescribed in the IP Act and the RTI Act.¹⁴ I have acted in this way in making this decision, in accordance with section 58(1) of the HR Act. I also note the observations made by Bell J on the interaction between equivalent pieces of Victorian legislation:¹⁵ '*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.*'¹⁶

⁹ Applicant's email to the Department dated 21 June 2019.

¹⁰ The recordings were attached to an email and accordingly no metadata is available.

¹¹ On 17 December 2021, subject to the redaction of information that would, on balance, be contrary to the public interest to disclose, pursuant to section 47(3)(b) of the RTI Act.

¹² Released to the applicant by the Department on 11 November 2021.

¹³ Section 21(2) of the HR Act.

¹⁴ *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].

¹⁵ *Freedom of Information Act 1982* (Vic) and the *Charter of Human Rights and Responsibilities Act 2006* (Vic).

¹⁶ **XYZ** at [573].

Issue for determination

13. The sole issue remaining to be determined in this decision is whether all reasonable steps have been taken by the Department to locate any further copies of Recordings 1 and 2 and any metadata or other documents in relation to those recordings (such that access to further documents may be refused on the ground they are nonexistent or unlocatable).¹⁷

Relevant law

14. Under the IP Act, an individual has a right to access their personal information¹⁸ subject to some limitations.¹⁹ Relevantly, access to a document may be refused if the document is nonexistent or unlocatable.²⁰
15. The IP Act also provides that where an access application expressly states that access to metadata about a document is sought, access to the metadata does not need to be given unless access is reasonably practicable.²¹ Metadata about a document, includes information about the document's content, author, publication date and physical location.²²
16. A document is nonexistent if there are reasonable grounds to be satisfied that the document does not exist.²³ A document is unlocatable if it has been or should be in the agency's possession and all reasonable steps have been taken to find the document but it cannot be found.²⁴
17. To be satisfied that documents are nonexistent, a decision-maker must rely on their particular knowledge and experience and have regard to a number of key factors:²⁵
- the administrative arrangements of government
 - the respondent agency's structure
 - the respondent agency's functions and responsibilities
 - the respondent agency's practices and procedures (including but not exclusive to its information management approach); and
 - other factors reasonably inferred from information supplied by the applicant including the nature and age of the requested document/s and the nature of the government activity to which the request relates.
18. When proper consideration is given to relevant factors, it may not be necessary for searches to be conducted. However, if searches are relied on to justify a decision that the documents do not exist, all reasonable steps must be taken to locate the documents. What constitutes reasonable steps will vary from case to case as the search and enquiry process an agency will be required to undertake will depend on which of the key factors are most relevant in the particular circumstances.

¹⁷ Sections 47(3)(e) and 52(1) of the RTI Act.

¹⁸ Section 40(1) of the IP Act.

¹⁹ Section 67 of the IP Act provides that an agency may refuse access to a document of an agency in the same way and to the same extent the agency could refuse access to the document under section 47 of the RTI Act, were the document to be the subject of an access application under that Act.

²⁰ Sections 47(3)(e) and 52 of the RTI Act.

²¹ Section 48(2) of the IP Act.

²² Section 48(3) of the IP Act.

²³ Section 52(1)(a) of the RTI Act.

²⁴ Section 52(1)(b) of the RTI Act.

²⁵ *Pryor and Logan City Council* (Unreported, Queensland Information Commissioner, 8 July 2010) (**Pryor**) at [19] which adopted the Information Commissioner's comments in *PDE and the University of Queensland* (Unreported, Queensland Information Commissioner, 9 February 2009).

19. To determine whether a document exists, but is unlocatable, the RTI Act requires consideration of whether there are reasonable grounds to be satisfied that the requested document has been or should be in the agency's possession; and whether the agency has taken all reasonable steps to find the document.²⁶
20. The Information Commissioner's external review functions include investigating and reviewing whether agencies have taken reasonable steps to identify and locate documents applied for by applicants.²⁷ Generally, 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.²⁸ However, where an external review involves the issue of missing documents, the applicant has a practical onus to establish reasonable grounds to be satisfied that the agency has not discharged its obligation to locate all relevant documents.²⁹ Suspicion and mere assertion will not satisfy this onus.³⁰

Findings

21. During the external review, OIC required the Department to conduct further searches for documents responsive to the access application and as noted at paragraph 8 above, further documents were located and released to the applicant.³¹
22. After these documents were released to the applicant,³² the applicant submitted that the Department had not conducted all reasonable searches and accordingly should undertake further searches to locate Recordings 1 and 2 and any metadata in relation to those recordings.³³ The applicant submitted that further searches should be undertaken:
 - by the Department's Integrity and Employee Relations Unit (**IER Unit**)
 - of the network drives of the Deputy Principal and Secondary Principal of the school; and
 - by the Department's legal branch.

The Department's IER Unit

23. From the information located by the Department, it appears that some of the applicant's complaints were managed by the relevant Region (**Region**), whereas his complaints about employee misconduct were managed by the IER Unit.
24. In support of his contention that the IER Unit would be in possession of Recordings 1 and 2 and therefore metadata and other document/s in relation to those recordings, the applicant provided OIC with the following:³⁴
 - an email from the applicant to a Complaints & Risk Advisor within the IER Unit, in relation to the applicant's complaints. In the email the applicant refers to a

²⁶ Pryor at [20]-[21].

²⁷ Section 137(2) of the IP Act. The Information Commissioner also has power under section 115 of the IP Act to require additional searches to be conducted during an external review.

²⁸ Section 100(1) of the IP Act.

²⁹ *Mewburn and Department of Local Government, Community Recovery and Resilience* [2014] QICmr 43 (31 October 2014) at [13].

³⁰ *Parnell and Queensland Police Service* [2017] QICmr 8 (7 March 2017) at [23]; *Dubois and Rockhampton Regional Council* [2017] QICmr 49 (6 October 2017) at [36]; *Y44 and T99 and Office of the Public Guardian* [2019] QICmr 62 (20 December 2019) at [38].

³¹ This is in addition to the 1,463 pages that the Department had already released to the applicant in full.

³² Together with further documents located by the Department in another external review with OIC.

³³ Applicant's email to OIC dated 16 June 2022.

³⁴ Applicant's email to OIC dated 1 September 2020.

telephone conversation between the applicant and the Complaints & Risk Advisor and states:

You also told me that the Department had a copy of my private conversation and there was no offence against the Invasion of Privacy Act in obtaining that but you still want me to resend it to you?

- an extract from the IER Unit's case management system, which records that an IER Unit Investigator spoke to OIC about the applicant's allegation that the Principal had breached his privacy in on-forwarding the Email with Recordings 1 and 2 attached; and
 - an email from the Complaints & Risk Advisor in which she advises the applicant that she needs to arrange a meeting with her Principal Advisor to '*discuss the voice recordings that was [sic] shared amongst the region*'.
25. I have carefully considered the applicant's submission and supporting information and have concluded that further copies of Recordings 1 and 2 and any associated metadata or document relating to Recordings 1 and 2 do not exist. My reasons for this conclusion follow.
26. Firstly, on the information before me, it is evident that during the initial processing period, the Department conducted searches within the following areas of the IER Unit:
- Office of the Assistant Director-General
 - Employee Relations; and
 - Integrity and Assessment
27. Searches were made in: HPE TRIM, Outlook, network storage (including historical archives) and Resolve.³⁵
28. Additionally, during the external review the IER Unit also conducted further searches of Resolve and Contents Manager. The written certifications provided by the Department indicate that the staff of the IER Unit spent more than eight hours searching for documents relevant to the access application and Recordings 1 and 2 were not located. The Department, having conducted these searches, stated they could not locate copies of Recordings 1 and 2 in the IER Unit. The Department also stated that while the IER Unit located a copy of the Email, it did not have Recordings 1 and 2 attached to it.³⁶
29. I note in this regard, it is clear from the documents located by the Department (in this and the other external review noted at paragraph 7), that the Principal received the Email from the applicant and on-forwarded it to the Deputy Principal and Secondary Principal of the school and separately onforwarded it to the Assistant Regional Director of the Region (**Forwarded Email**). I have viewed the Forwarded Email and there are no attachments, suggesting that if the Region (and there is nothing before me to suggest this is the case) onforwarded the Forwarded Email to the IER Unit, it also would not have had Recordings 1 and 2 attached.
30. Secondly, I have listened to the recordings of the telephone conversations between the applicant and an Investigator within the IER Unit. In one of the telephone

³⁵ I understand these to be the Department's case management system and records management databases.

³⁶ On 20 June 2022, the Department provided OIC with a copy of the Email in the possession of the IER Unit, I have reviewed the Email and it does not have Recordings 1 and 2 attached to it.

conversations,³⁷ the Investigator raises the recordings made by the applicant during the re-entry meeting with the Acting Head of Department at the school. The applicant states that he provided Recordings 1 and 2 to the Principal of the school, but he has not provided them to the IER Unit.³⁸ Later in the conversation the Investigator requests that the applicant provide the recordings to the IER Unit. However, the applicant states that he does not consider that he can disclose the recordings as they are not 'reasonably necessary' for the purposes of the Department's investigation. I consider this telephone conversation also supports a conclusion that Recordings 1 and 2 were not in the possession of the IER Unit.

31. Finally, I do not agree with the applicant that the information he provided to OIC as referred to at paragraph [24](#) necessarily supports his view that Recordings 1 and 2 must be in the power or possession of the IER Unit.
32. In particular, the applicant's email to the Complaints & Risk Advisor within the IER Unit provides his subjective view of what the Complaints & Risk Advisor stated during their telephone conversation. I also note that while the applicant submits the Complaints & Risk Advisor stated that the Department was in possession of Recordings 1 and 2, this does not necessarily lead to the conclusion that Recordings 1 and 2 were held by the IER Unit and not elsewhere within the Department.
33. In relation to the case management note made by the IER Unit Investigator, the applicant submitted that the note shows that the Investigator '*discussed the contents of those recordings with the OIC*'.³⁹ I take the applicant to mean that the Investigator must have listened to Recordings 1 and 2 and accordingly by implication those recordings must be in the possession of the IER Unit.
34. I do not agree with the applicant's submission. The Investigator's note states that he outlined the background of the applicant's allegation and '*substance of recording*' to OIC. From listening to the telephone conversations between the applicant and the Investigator, I consider that the Investigator was able to glean the substance of Recordings 1 and 2 from the information provided by the applicant and therefore did not necessarily hold a copy of Recordings 1 and 2 when communicating with the OIC.
35. Similarly, I do not consider the email from the Complaints & Risk Advisor stating that she was going to arrange a meeting with her Principal Advisor to discuss the voice recordings, necessarily implies that a copy of Recordings 1 and 2 was held by the IER Unit.
36. As set out at paragraph [19](#), in circumstances where searches have been relied on to determine that a document does not exist, the issue to be determined is whether all reasonable steps have been taken to locate the document.
37. Having carefully considered the applicant's submissions, the search information provided by the Department, the Forwarded Email and the recordings of the conversations between the applicant and the Investigator, I am satisfied that:
 - searches undertaken have been appropriate and targeted
 - all reasonable steps have been taken by the Department to locate any copies of Recordings 1 and 2 and any associated metadata or document within the IER Unit; and

³⁷ Titled 'Recorded phone call 2'.

³⁸ I also note that earlier in the telephone conversation, the applicant states that he has not provided Recordings 1 and 2 to the Region.

³⁹ Email to OIC dated 16 June 2022.

- no responsive documents exist.

The electronic accounts of the Deputy Principal and Secondary Principal

38. As noted at paragraph 7, in a related external review matter, searches were conducted of the email accounts of the school's Deputy Principal and Secondary Principal, and the Email and Recordings 1 and 2 were located and released to the applicant in full.
39. In this external review, the applicant submitted that searches should be conducted of the Deputy Principal and Secondary Principal's network drives, to ascertain if Recordings 1 and 2 had been saved to any of those drives, as accordingly metadata would be available in relation to the recordings being saved.
40. In support of his view that further searches should be conducted, the applicant refers to the related external review, in which extensive searches were conducted of the school Principal's network drives to locate documents. The applicant submitted:⁴⁰

As it was reasonable to conduct searches of [the Principal's] account and anywhere that [the Principal] could have saved the recordings, it is also reasonable the same searches are conducted for [the Deputy Principal] and [the Secondary Principal]. Can you confirm that [the Deputy Principal], [the Secondary Principal], [the Region] and [the IER Unit] have supplied certificates that specifically target the recordings?

41. In relation to the further searches proposed by the applicant for further documents held by the Deputy Principal, I am satisfied that such searches are not warranted. My reasons for this position follow.
42. While the Deputy Principal located a copy of the Email and Recordings 1 and 2 that had been forwarded to him by the Principal (which as noted in paragraph 7, have been disclosed to the applicant in full), the Deputy Principal stated (in response to the Department's initial request that searches be undertaken by the Deputy Principal) that while Recordings 1 and 2 were attached to the Email, he had never listened to the recordings nor opened them.⁴¹ Based on the Deputy Principal's assertion, I consider that it is reasonable to conclude that no other copies of Recordings 1 and 2 or associated metadata or document were created by the Deputy Principal and the recordings were only in his possession as they were attached to the Email. Therefore, I do not consider that there are reasonable grounds to require searches to be conducted of the Deputy Principal's network drives.
43. As regards the Secondary Principal, the searches undertaken of the Secondary Principal's email account also located a forwarded copy of the Email (which again was disclosed to the applicant in full) which showed that Recordings 1 and 2 were attached. OIC conducted further enquiries with the Secondary Principal in relation to Recordings 1 and 2.
44. The Secondary Principal stated that he received Recordings 1 and 2 as attachments to an email and did not recall saving the recordings to a network drive. However, the Secondary Principal conducted searches of his OneDrive account, G Drive, H Drive and his external hard drive and did not locate Recordings 1 and 2.⁴² Accordingly, I am satisfied that all reasonable searches have been conducted by the Secondary Principal to locate Recordings 1 and 2 and any associated metadata or document.

⁴⁰ Email to OIC dated 16 June 2022.

⁴¹ Page 6 of the documents located by the Deputy Principal.

⁴² Telephone conversation with the Secondary Principal on 24 June 2022 during which the Secondary Principal conducted searches and conveyed the results to OIC.

45. In these circumstances, I must conclude that there are reasonable grounds to be satisfied that no further documents relevant to the applicant's request exist in relation to the Deputy Principal and the Secondary Principal.

The Department's legal branch

46. The applicant submitted that searches should be undertaken by the Department's legal branch for Recordings 1 and 2 and any associated metadata or document, as he believed that the Principal of the school was corresponding with the legal branch in relation to the complaints that he had made about the school.
47. The applicant's submission that the legal branch should conduct searches, is the same submission that was raised in the related external review application.⁴³ In that matter I concluded that all reasonable steps had been taken to locate documents and that there were reasonable grounds to be satisfied that no further documents relevant to the applicant's request exist. I do not intend to repeat my reasoning in this decision, other than to say for the same reasons as stated at paragraphs 32 to 40, in *Z74 and Department of Education*,⁴⁴ I am satisfied that all reasonable steps have been taken to locate the documents responsive to the terms of the applicant's application and there are reasonable grounds to be satisfied that no further documents relevant to the applicant's request exist.

DECISION

48. For the reasons set out above, I am satisfied that the Department has taken reasonable steps to locate all copies of Recordings 1 and 2 and any metadata or other documents in relation to those recordings that are held within the Department. Accordingly, I vary the Department's decision and find that access may be refused to any further copies of Recordings 1 and 2 and associated metadata or document under section 67(1) of the IP Act and sections 47(3)(e) and 52(1) of the RTI Act on the ground they are nonexistent.
49. I have made this decision as a delegate of the Information Commissioner, under section 139 of the IP Act.

Assistant Information Commissioner Corby

Date: 30 June 2022

⁴³ As referred to at paragraph 7.

⁴⁴ [2022] QICmr 35 (30 June 2022).

APPENDIX

Significant procedural steps

Date	Event
23 July 2020	OIC received the application for external review.
27 July 2020	OIC requested preliminary documents and information from the Department.
7 August 2020 and 19 August 2020	OIC received the preliminary documents and information from the Department.
19 August 2020	OIC notified the applicant and the Department that the external review had been accepted.
21 August 2020	OIC received documents located in response to the access application and records of searches conducted from the Department.
1 September 2020	OIC received an email from the applicant providing further information about his sufficiency of search concerns.
11 November 2020 - 15 March 2021	OIC provided various updates to the applicant and the Department.
18 February 2021	OIC received an email from the applicant.
29 March 2021	OIC wrote to the Department conveying a preliminary view in relation to some information and requesting the Department conduct further searches.
9 April 2021	OIC received and provided the applicant with an update.
19 April 2021	OIC received an email from the applicant.
11 May – 4 June 2021	OIC received requests for extensions of time to the Department to respond to OIC's letter dated 29 March 2021.
26 May and 28 June 2021	OIC provided the applicant with an update.
7 – 13 July 2021	OIC contacted the Department in relation to its overdue response.
29 July 2021	OIC served on the Department, a Notice to Produce Information and Documents pursuant to section 116 of the IP Act, requiring a response to the outstanding issues in OIC's letter dated 29 March 2021.
16 August 2021	OIC received a response from the Department.
15 October 2021	OIC received an email from the applicant.
19 October 2021	OIC wrote to the Department requesting it release information to the applicant and provide further information to OIC.
27 October 2021 and 12 November 2021	OIC communicated with the applicant in relation to the information OIC had requested the Department release to the applicant.
11 November 2021	OIC followed up the Department for a response to OIC's letter dated 19 October 2021.

Date	Event
13 November 2021	OIC received a response from the Department.
23 November 2021	OIC requested the Department release further information to the applicant and provided the applicant with an update.
29 November 2021 and 14 December 2021	OIC received emails from the applicant and followed up the Department to release the information to the applicant as referred to in OIC's email dated 23 November 2021.
14 December 2021	OIC followed up the Department to release the information to the applicant as referred to in OIC's email dated 23 November 2021.
17 December 2021	OIC received confirmation from the Department that it had disclosed the information to the applicant.
31 January 2022 and 24 May 2022	OIC provided the applicant with an update.
2 June 2022	OIC wrote to the applicant addressing the issues in the review.
2 June 2022	OIC received submissions from the applicant by telephone.
6 June 2022	OIC wrote to the Department requesting that further searches be conducted by its Integrity and Employee Relations Unit. OIC received a call from the Department in relation to OIC's search request.
16 June 2022	OIC received further submissions from the applicant.
20 June 2022	OIC received a response from the Department.
23 June 2022	OIC spoke to the Department in relation to its response.
24 June 2022	OIC contacted the Secondary Principal.