



Decision and Reasons for Decision

Citation:	<i>P90 and Brisbane City Council [2021] QICmr 23 (27 May 2021)</i>
Application Number:	315502
Applicant:	P90
Respondent:	Brisbane City Council
Decision Date:	27 May 2021
Catchwords:	ADMINISTRATIVE LAW - RIGHT TO INFORMATION - IRRELEVANT INFORMATION - information about other staff members not involving the applicant - whether deleted information is irrelevant to the terms of the access application - section 88 of the <i>Information Privacy Act 2009</i> (Qld) ADMINISTRATIVE LAW - RIGHT TO INFORMATION - REFUSAL OF ACCESS - CONTRARY TO THE PUBLIC INTEREST INFORMATION - documents relating to applicant's termination of employment - personal information and privacy - prejudice to management function of Council and ability to obtain confidential information - whether disclosure of information would, on balance, be contrary to the public interest - section 67(1) of the <i>Information Privacy Act 2009</i> (Qld) and sections 47(3)(b) and 49 of the <i>Right to Information Act 2009</i> (Qld)

REASONS FOR DECISION

Summary

1. The applicant applied¹ to Brisbane City Council (**Council**) under the *Information Privacy Act 2009* (Qld) (**IP Act**) for access to documents containing his personal information,² as a Council employee, for the period 23 July 2019 to 13 December 2019.
2. Council released a number of documents and decided³ to refuse access to some information on the basis it was subject to legal professional privilege and therefore exempt information,⁴ and to refuse access to other information which would, on balance,

¹ On 13 December 2019.

² Especially noting documents held with City Workcover, the Construction Forestry Maritime Mining Energy Union (**Union**), the Right to Information Unit, and all correspondence between Council and the Office of the Information Commissioner.

³ On 28 February 2020.

⁴ Section 67(1) of the IP Act and sections 47(3)(a), 48, and schedule 3, section 7 of the *Right to Information Act 2009* (Qld) (**RTI Act**).

be contrary to the public interest to disclose.⁵ Council also deleted some small portions of irrelevant information.⁶

3. The applicant applied⁷ for internal review of Council's decision. On internal review,⁸ Council upheld the original decision.
4. The applicant then applied⁹ to the Office of the Information Commissioner (**OIC**) for external review.
5. For the reasons outlined below, I affirm Council's internal review decision refusing access to the information in issue on the ground that disclosure would, on balance, be contrary to the public interest; and deleting irrelevant information from the documents.

Background

6. The information requested by the applicant in this matter concerns his employment records and can be broadly described as relating to a workplace grievance involving the applicant. It includes information about management actions taken by Council.

Reviewable decision

7. The decision under review is Council's internal review decision dated 18 June 2020.

Evidence considered

8. Significant procedural steps relating to the external review are set out in the Appendix.
9. 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 carefully considered the applicant's submissions and have summarised them throughout this decision to the extent they are relevant to the issues in this review.¹⁰
10. I have also had regard to the *Human Rights Act 2019* (Qld) (**HR Act**), particularly the right to seek and receive information.¹¹ 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.¹² 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:¹³ '*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.*'¹⁴

⁵ Section 67(1) of the IP Act and sections 47(3)(b) and 49 of the RTI Act.

⁶ Section 88 of the IP Act.

⁷ On 22 May 2020.

⁸ On 18 June 2020.

⁹ On 14 July 2020.

¹⁰ Including the internal review application dated 22 May 2020, external review application received 14 July 2020 and submissions received on 4 January 2021, 24 March 2021 and 30 April 2021.

¹¹ Section 21 of the HR Act.

¹² *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].

¹³ *Freedom of Information Act 1982* (Vic) and the *Charter of Human Rights and Responsibilities Act 2006* (Vic).

¹⁴ *XYZ* at [573].

Information in issue

11. The information in issue in this review comprises 259 pages¹⁵ and 6 audio recordings, categorised as follows:
 - information about unrelated human resource (**HR**)/staffing matters (**Irrelevant Information**)
 - 171 pages and 6 audio recordings (**Investigation Information**) including witness statements, witness interviews and HR correspondence; and
 - mobile telephone numbers of Council employees (**Mobile Telephone Numbers**).¹⁶
12. During the external review, the applicant accepted that the documents subject to legal professional privilege comprised exempt information and may be refused.¹⁷ Accordingly those documents are not in issue.

Issues for determination

13. The issues for determination are:
 - whether information may be deleted on the basis it is irrelevant; and
 - whether access to the Mobile Telephone Numbers and Investigation Information may be refused as disclosure would, on balance, be contrary to the public interest.

Irrelevant Information

14. Section 88 of the IP Act provides that an agency may give access to a document subject to the deletion of information it considers is not relevant to an application. This is a mechanism to allow irrelevant information to be deleted from documents which are identified for release to an applicant.
15. In deciding whether information is irrelevant, it is necessary to consider whether the information has any bearing upon, or is pertinent to, the terms of the application.¹⁸ I have carefully reviewed the deleted information and I am satisfied that it relates to performance matters of other Council staff and does not relate to the applicant. The information is outside the terms of the access application and can, therefore, be considered as information which is not relevant to the application.
16. On being advised of my view in this regard¹⁹ the applicant's representative provided lengthy submissions²⁰ on a range of issues that did not relate to the deletion of the Irrelevant Information by Council. Of the relevant submissions, the applicant's representative submitted that:

[The applicant] is not seeking the personal information of other Council staff in relation to their performance management....

Where redactions have been made about the performance management of other Council staff that was mentioned in emails, then I would assume such redactions had appropriate and legislated reasons and would request that the OIC check if this is the case. [sic]

¹⁵ There are multiple pages containing both redacted mobile telephone numbers and investigation information, which accounts for the disparity between the total pages in issue and the total pages for each category of refused information.

¹⁶ Appearing on 106 pages.

¹⁷ By email on 4 January 2021.

¹⁸ *O80PCE and Department of Education and Training* (Unreported, Queensland Information Commissioner, 15 February 2010) at [52] which was a decision made under the equivalent provision in the repealed *Freedom of Information Act 1992* (Qld).

¹⁹ On 14 April 2021.

²⁰ On 30 April 2021.

17. It appears the applicant has accepted that the information about the performance management of other Council staff is not relevant to the access application and seeks OIC's reassurance the deletions have been appropriately made.²¹ To remove any doubt, I confirm that I have assessed the Irrelevant Information and find that Council was entitled to delete it under section 88 of the IP Act.

Contrary to the public interest

Relevant law

18. Under the IP Act, a person has a right to be given access to documents of an agency.²² However, this right is subject to provisions of the IP Act and RTI Act including the grounds on which an agency may refuse access to documents.²³ An agency may refuse access to information where its disclosure would, on balance, be contrary to the public interest.²⁴
19. In assessing whether disclosure of information would, on balance, be contrary to the public interest, a decision maker must:²⁵
- identify factors irrelevant to the public interest and disregard them
 - identify factors in favour of disclosure of information
 - identify factors in favour of nondisclosure of information; and
 - decide whether, on balance, disclosure of the information would be contrary to the public interest.
20. Schedule 4 of the RTI Act contains non-exhaustive lists of factors that may be relevant in determining where the balance of public interest lies in a particular case. I have considered these lists,²⁶ together with all other relevant information, in reaching my decision. I have kept in mind the IP Act's pro-disclosure bias²⁷ and Parliament's requirement that grounds for refusing access to information be interpreted narrowly.²⁸

Investigation Information

21. The Investigation Information is comprised of management correspondence, witness statements and interviews that all relate to the applicant's workplace conduct, suspensions, and the subsequent management and legal processes. I acknowledge these are matters of importance to the applicant, and that he has made submissions that raise relevant public interest factors favouring disclosure:²⁹

²¹ Under section 88 of the IP Act.

²² Section 40 of the IP Act.

²³ Section 67(1) of the IP Act provides that an agency may refuse access to a document in the same way and to the same extent it could refuse access to the document under section 47 of the RTI Act were the document to be the subject of an access application under the RTI Act.

²⁴ Section 67(1) of the IP Act and section 47(3)(b) and 49 of the RTI Act. The term public interest refers to considerations affecting the good order and functioning of the community and government affairs for the well-being of citizens. This means that, in general, a public interest consideration is one which is common to all members of, or a substantial segment of the community, as distinct from matters that concern purely private or personal interests. However, there are some recognised public interest considerations that may apply for the benefit of an individual.

²⁵ Section 49(3) of the RTI Act.

²⁶ I have considered each of the public interest factors outlined in schedule 4 of the RTI Act, and any relevant factors are discussed below (in relation to each category of documents). Some factors have no relevance, for example, the factor concerning innovation and the facilitation of research.

²⁷ Section 64 of the IP Act.

²⁸ Section 67(2) of the IP Act and section 47(2) of the RTI Act. In deciding whether disclosure of the information in issue would, on balance, be contrary to the public interest, I have taken no irrelevant factors into account in making my decision.

²⁹ Including the internal review application dated 22 May 2020, external review application received 14 July 2020 and submissions received on 4 January 2021, 24 March 2021 and 30 April 2021.

I believe it to be important that disclosing the Investigation Documents/information would generally advance Council's accountability and transparency in terms of how it conducts investigations into workplace matters. It's also important to consider that disclosure could reasonably be expected to contribute to the administration of justice for me, or more generally, contribute to procedural fairness.

In my case, the investigation in question resulted in my removal from Council (suspension) and subsequent termination of employment. I believe that significant weight should be assigned to information with-held from an employee who is suspended pending an investigation including disciplinary proceedings. With respect, the OIC is weighing up the (possible) detriment to Council, it's management function and investigation processes against the significant, adverse impact of a permanent worker being (I believe, unfairly) dismissed. I was never given the opportunity to contest important, relative investigative information (and neither was my Trade Union) when this (redacted) information was released at the end of February 2020 (a month after my dismissal) and prior to QIRC proceedings.

...

The OIC should, I believe, put substantial weight into the impacts on employees who are terminated and then denied access to investigative information. I was terminated, and some information in the investigative process, had I and my Union had access to that information, may have meant I was reinstated.

Findings

Factors favouring disclosure

22. Firstly, as the applicant notes, the Investigation Information is about him, and the management process had significant consequences for his employment with Council. Accordingly, in the circumstances, I afford significant weight to the factor favouring disclosure³⁰ concerning the applicant accessing his own personal information.
23. I also accept that disclosing the Investigation Information would advance Council's accountability and transparency³¹ in terms of how it conducts workplace investigations.³² I also consider that it would allow the applicant to have a more complete picture of this particular workplace investigation, understand the background to Council's decision and enhance Council's accountability and transparency in this particular case.
24. In determining the weight that should be afforded to these factors, I have considered the documents already released to the applicant, both as part of the management processes that occurred, as well as through his access applications,³³ which in my view has significantly discharged these factors and reduces their weight.³⁴ The Information Commissioner has previously held that the requirement on an agency to be accountable and transparent in the conduct of disciplinary investigations does not oblige the agency to provide the applicant with access to its entire investigation file, nor reveal all of the information it gathered in dealing with the investigation.³⁵ In this case, I consider that sufficient information has been disclosed by Council to explain its investigation and disciplinary action process and, therefore, I afford moderate weight to these factors in respect of the Investigation Information.

³⁰ Schedule 4, part 2, item 7 of the RTI Act.

³¹ Schedule 4, part 2, items 1, 3 and 11 of the RTI Act.

³² 8A3BPQ and Queensland Police Service [2014] QICmr 42 (30 October 2014) at [22] to [24] (**8A3BPQ**); F60XCX and Department of Natural Resources and Mines [2017] QICmr 19 (9 June 2017) at [61] to [66] (**F60XCX**).

³³ Including the 844 part and full pages and 5 audio recordings disclosed to the applicant in this application.

³⁴ As of 18 May 2021, Council has disclosed more than 3,200 pages to the applicant across 5 separate IP Act access applications of which OIC is aware (as they are either finalised or current external reviews with OIC).

³⁵ 8A3BPQ at [24].

25. I have also considered whether disclosure could reasonably be expected to contribute to the administration of justice for the applicant, or more generally contribute to procedural fairness.³⁶ In the context of a workplace investigation, procedural fairness generally requires that a person is:
- adequately informed of the allegations made against them
 - given an opportunity to respond to the allegations; and
 - informed of the outcome of the investigation.³⁷
26. The applicant has previously been advised of the nature of the allegations in an interview with Council³⁸ and a detailed Show Cause Notice issued by Council.³⁹ The applicant was provided with an opportunity to respond, including being granted two extensions of time to respond, and was also offered a face to face meeting with the decision maker to provide any further information.⁴⁰ The applicant was then informed of the decision and the reasons for Council's decision, with specific reference to his response.⁴¹
27. Relevantly, the Information Commissioner has previously held that fair treatment and procedural fairness in a workplace investigation does not *'entitle the applicant to all information about the investigation including the information provided by other individuals who participated in the investigation process.'*⁴² Having considered both the refused and released information, I do not consider that disclosure of the Investigation Information would substantially contribute to any further procedural fairness for the applicant and I therefore afford low weight to this factor favouring disclosure.⁴³
28. In respect of the applicant's submissions that disclosure of the Investigation Information would contribute to the administration of justice for him personally, I understand the applicant's submission to be that he considers significant weight should be afforded to this factor because of the *'significant adverse impact'* on him, as a permanent employee who, in his view, was unfairly dismissed.⁴⁴ I am unable to identify how disclosure of the Investigation Information would contribute to the administration of justice for the applicant⁴⁵ – that is, the connection between disclosure of the documents themselves and the claimed public interest factor advanced by the applicant. Relevantly, it is unclear what legal remedies the applicant is seeking or how disclosure of the Investigation Information would assist him in pursuing or evaluating any legal remedies.⁴⁶ Additionally, the applicant received documents from Council prior to lodging his QIRC application alleging unfair dismissal. This process is now concluded, and the applicant has not provided evidence of any new proceedings in relation to his dismissal. Accordingly, I

³⁶ Schedule 4, part 2, items 16 and 17 of the RTI Act.

³⁷ *Gapsa and Department of Transport and Main Roads* (Unreported, Queensland Information Commissioner, 6 September 2013) at [20]; and *ODW0PH and Queensland Bulk Water Supply Authority trading as Seqwater* [2017] QICmr 3 (13 February 2017) at [28].

³⁸ On 28 October 2019 with the applicant and Union representative.

³⁹ Dated 11 November 2019 and appearing in Part 2, pages 51-62 of the released documents. Council provided significant detail of the allegations across 5 pages of the 11 page Show Cause Notice to the applicant, including dates, names of other parties involved in the events or conversations, and details of what was alleged to have been said or done by the applicant.

⁴⁰ Appearing in part 2, pages 2-3 and part 11, page 50 of the released documents in this review; see also external review 315667, part 2, pages 5-16 of the released documents.

⁴¹ The applicant's 12-page response to the Show Cause Notice appears in part 2, pages 5-16 of the released documents.

⁴² *8A3BPQ* at [28].

⁴³ Schedule 4, part 2, item 16 of the RTI Act.

⁴⁴ Applicant submission received 4 January 2021. I have also had regard to the confidential outcome of the applicant's application to the Queensland Industrial Relations Commission (**QIRC**) with the assistance of the Union which is evident in the released documents in external review 315667 (also between the applicant and Council).

⁴⁵ *I6XD0H and Department of Community Safety* (Unreported, Queensland Information Commissioner, 26 June 2012) at [23] to [29] (*I6XD0H*). The applicant has not advanced any submissions or evidence to suggest he considers the criteria set out in *Willsford and Brisbane City Council* (1996) 3 QAR 368 apply to his circumstances.

⁴⁶ I have noted the circumstances of the applicant's QIRC claim and that the outcome of that matter is confidential.

attribute minimal weight to this factor in relation to disclosure of the Investigation Information.⁴⁷

29. The applicant has submitted that Council has engaged in serious wrongdoing in its dealings with him in this matter.⁴⁸ Accordingly, I must consider whether disclosure of the Investigation Information would allow or assist inquiry into possible deficiencies of conduct or administration by Council or Council employees, or reveal or substantiate misconduct or negligent, improper or unlawful conduct by Council or Council employees.⁴⁹ In order for these public interest factors to be enlivened, the Investigation Information must comprise some information that would allow inquiry into possible deficiencies of conduct, or reveal or substantiate misconduct or negligent, improper or unlawful conduct by Council or Council staff.
30. I have reviewed the Investigation Information and I am satisfied it does not contain any information that would suggest deficiencies of conduct, or misconduct or negligent improper or unlawful conduct by Council or its employees. The Investigation Information shows that senior Council staff were concerned about the safety risks posed by the applicant's conduct and undertook management actions while ensuring the applicant was provided with significant detail of the allegations against him and opportunities to respond. I am satisfied that these factors do not apply to disclosure of the Investigation Information.

Factors favouring nondisclosure

31. Turning now to the factors favouring nondisclosure, firstly I note that public interest factors favouring nondisclosure will arise where:
- disclosure could reasonably be expected to prejudice the management function of an agency;⁵⁰ and
 - disclosure of the information could reasonably be expected to prejudice an agency's ability to obtain confidential information.⁵¹
32. While I am limited in the detail I am able to use to describe the Investigation Information,⁵² it is sufficient for current purposes to note that the documents are comprised of communications between managers and witness information (including statements, interviews and complaints). In terms of the communications between managers, I am satisfied that disclosing frank communications between managers on how to deal with an employee's conduct, could reasonably be expected to impact on the information that is exchanged between managers in the conduct of staff management. In terms of the witness statements, I am satisfied that disclosure may deter witnesses from providing full and open accounts to investigators in future workplace investigations, thereby prejudicing Council's ability to obtain confidential information in the future and its investigation processes and outcomes. In order to conduct effective workplace investigations, agencies rely on managers speaking frankly and staff cooperating in the investigative process.⁵³ Accordingly, I afford the two nondisclosure factors identified above significant weight.

⁴⁷ Schedule 4, part 2, item 17 of the RTI Act.

⁴⁸ By telephone call on 18 December 2020.

⁴⁹ Schedule 4, part 2, items 5 and 6 of the RTI Act.

⁵⁰ Schedule 4, part 3, item 19 of the RTI Act.

⁵¹ Schedule 4, part 3, item 16 of the RTI Act.

⁵² Section 121(3) of the IP Act.

⁵³ *F60XCX* at [129] to [136]; *I6XD0H* at [33] to [35]; *Gapsa and Department of Transport and Main Roads* (Unreported, Queensland Information Commissioner, 6 September 2013) at [30] to [35]; *Maffliet and Department of Justice and Attorney-General* [2015] QICmr 5 (19 March 2015) at [25].

33. The Investigation Information also contains the personal information of individuals other than the applicant, and disclosure would prejudice these individuals' right to privacy.⁵⁴ In terms of the witness information, although it is provided at work, it is not routine personal work information,⁵⁵ as it comprises sensitive information given in relation to a workplace investigation. For this reason, I consider that disclosure of this information under the IP Act would be a significant intrusion into the witnesses' privacy and the extent of the public interest harm that could be anticipated from disclosure is significant. To the extent that the information comprises communications between managers, I consider this is their routine work information and accordingly, the personal information and privacy factors favouring nondisclosure carry low weight.

Balance of public interest factors

34. I acknowledge the general public interest in furthering access to government-held information.⁵⁶ I have given significant weight to the factor favouring disclosure insofar as the Investigation Information contain the applicant's own personal information. I have also recognised that moderate weight can be attributed to factors concerning accountability and transparency, and some (albeit low) weight should be given to the factors concerning administration of justice and procedural fairness.
35. Balanced against these factors favouring disclosure is the significant weight to be given to the reasonable expectation of prejudice of Council's management function and its ability to obtain confidential information if the Investigation Information is disclosed. I find that these factors carry the most weight in the circumstances and are sufficient to tip the balance in favour of nondisclosure. Further, I consider the nondisclosure factors and harm factors with respect to privacy and personal information of other Council employees contained in the Investigation Information, also carry significant and determinative weight. I have had regard to the level of information already provided to the applicant in the course of the relevant management processes as well as the specific nature of the information in issue in balancing the relevant factors.
36. For the reasons set out above, I find that disclosure of the Investigation Information would, on balance, be contrary to the public interest, and access may be refused.

Mobile Telephone Numbers

Findings

37. Council has redacted Mobile Telephone Numbers from the documents. I acknowledge the applicant's submissions that mobile numbers had previously been released to him, that the redactions have been applied inconsistently by Council, and that Council is not applying its own policies.⁵⁷ I also acknowledge the applicant's submissions that, as he considers Council Mobile Telephone Numbers to be Council information, it would not be contrary to the public interest to disclose them.⁵⁸ However, these submissions do not raise relevant factors in favour of disclosure under the RTI Act aside from the general public interest in promoting public access to government-held information.⁵⁹ Given the

⁵⁴ Schedule 4, part 3, item 3 and schedule 4, part 4, section 6(1) of the RTI Act.

⁵⁵ Often, information relating to the day-to-day work duties of a public servant may be disclosed under the IP and RTI Acts, despite it falling within the definition of personal information. Generally, this information would not, on balance be contrary to the public interest to disclose. However, agency documents can also contain personal information of public servants which is not routine work information: see *Gapsa and Department of Transport and Main Roads* (Unreported, Queensland Information Commissioner, 12 April 2013) at [71].

⁵⁶ Schedule 4, part 2, items 1, 3 and 11 of the RTI Act.

⁵⁷ By email on 4 January 2021, 24 March 2021, and 30 April 2021.

⁵⁸ By email on 24 March 2021.

⁵⁹ Schedule 4, part 2, items 1, 3 and 11 of the RTI Act.

limited nature of this information⁶⁰, that is the Mobile Telephone Numbers only, I am not able to identify any further public interest factors favouring disclosure.

38. In contrast, release of this information would disclose personal information of Council officers.⁶¹ The Information Commissioner has previously held that *'a mobile phone number is different to other contact details (such as email addresses or office phone numbers) in that it allows an individual to be contacted directly and potentially outside of working hours....[and] permits potential contact with an employee when off duty and/or engaged in private activity, which gives rise to a reasonable expectation of intrusion into the officer's private life or 'personal sphere'.*⁶²
39. In terms of the weight to be attributed to the nondisclosure factors concerning personal information and privacy, I note that applicant's submissions that he has had access to the Mobile Telephone Numbers when previously employed by Council. I accept that where this is the case, his previous access may reduce the nondisclosure factors to a certain extent. However, given that I am not able to identify any specific relevant factors favouring disclosure, I find that the moderate to low weight that I can attribute to the privacy and personal information nondisclosure and harm factors is sufficient to support my finding that disclosure of the Mobile Telephone Numbers would, on balance, be contrary to the public interest, and access may therefore be refused.

DECISION

40. For the reasons set out above, I affirm Council's decision and find that:
- the Irrelevant Information may be deleted under section 88 of the IP Act; and
 - access to the Investigation Information and Mobile Telephone Numbers may be refused under sections 67(1) of the IP Act and 47(3)(b) of the RTI Act, on the ground that disclosure would, on balance, be contrary to the public interest.
41. I have made this decision as a delegate of the Information Commissioner, under section 139 of the IP Act.

S Martin
Assistant Information Commissioner

Date: 27 May 2021

⁶⁰ The pro-disclosure bias is set out in section 64 of the IP Act.

⁶¹ Giving rise to factors favouring nondisclosure under schedule 4, part 3, item 3 and part 4, section 6 of the RTI Act.

⁶² *Smith and Sunshine Coast Regional Council; Diamond Energy Pty Ltd (Third Party)* [2017] QICmr 42 5 September 2017) at [16]. See also *Underwood and Minister for Housing and Public Works* [2015] QICmr 27 (29 September 2015) at [66] to [68].

Appendix

Significant procedural steps

Date	Event
14 July 2020	OIC received the external review application.
17 July 2020	OIC requested preliminary documents from Council.
27 August 2020	OIC notified the applicant and Council that the external review application was accepted and requested information in issue from Council.
28 August 2020	OIC received the requested information from Council.
20 November 2020	OIC issued a preliminary view to the applicant.
18 December 2020	OIC had a telephone conference with the applicant and his representative.
4 January 2021	OIC received submissions from the applicant in response to the preliminary view.
11 February 2021	OIC issued a preliminary view to Council.
16 February 2021	OIC received submissions from Council in response to the preliminary view.
11 March 2021	OIC issued a further preliminary view to the applicant.
24 March 2021	OIC received submissions from the applicant in response to the further preliminary view.
14 April 2021	OIC issued a further preliminary view to the applicant about the deletion of irrelevant information.
30 April 2021	OIC received further submissions from the applicant's representative.