



Decision and Reasons for Decision

Citation: *Underwood and Department of Housing and Public Works (No. 3) [2017] QICmr 15 (20 April 2017)*

Application Number: 100105 (remitted matter 310595)

Applicant: Underwood

Respondent: Department of Housing and Public Works

Decision Date: 20 April 2017

Catchwords: **ADMINISTRATIVE LAW – RIGHT TO INFORMATION – REFUSAL TO DEAL WITH APPLICATIONS** – information subject of earlier access application and completed external review – whether the Information Commissioner should decide not to further deal with part of external review application concerning information previously dealt with under section 94(1)(a) of the *Right to Information Act 2009* (Qld)

ADMINISTRATIVE LAW – RIGHT TO INFORMATION - SCOPE OF APPLICATION – application for access to information – information falling outside the scope of the access application

ADMINISTRATIVE LAW – RIGHT TO INFORMATION – REFUSAL OF ACCESS – EXEMPT INFORMATION – LEGAL PROFESSIONAL PRIVILEGE – whether information is exempt on the basis of legal professional privilege under schedule 3, section 7 of the *Right to Information Act 2009* (Qld) - whether access may be refused under sections 47(3)(a) and 48 of the *Right to Information Act 2009* (Qld)

ADMINISTRATIVE LAW – RIGHT TO INFORMATION – REFUSAL OF ACCESS – CONTRARY TO PUBLIC INTEREST INFORMATION – access refused to information about other individuals – personal information and privacy – business, commercial, financial affairs – whether disclosure would, on balance, be contrary to public interest – whether access may be refused under sections 47(3)(b) and 49 of the *Right to Information Act 2009* (Qld)

REASONS FOR DECISION

Summary

1. The applicant applied¹ to the Department of Communities (**Communities**) under the *Right to Information Act 2009* (Qld) (**RTI Act**) for ‘the complete file’ concerning a specified residential unit then owned by Communities. The applicant was a public housing tenant of the unit at the time she made her application.
2. Communities did not make a decision within the timeframe prescribed in the RTI Act. Under section 46(1) of the RTI Act, Communities was therefore taken to have made a decision refusing access to the requested information (**Deemed Refusal**).
3. The applicant applied² to the Office of the Information Commissioner (**OIC**) for external review of the Deemed Refusal.
4. OIC did not determine substantive issues arising from the applicant’s external review application, but decided³ not to further deal with that application, in accordance with section 94(1)(a) of the RTI Act (**Original Decision**).
5. The applicant appealed OIC’s Original Decision to the Queensland Civil and Administrative Tribunal (**QCAT**). By order dated 23 October 2014,⁴ QCAT set aside the Original Decision and remitted the matter to OIC to be dealt with according to the provisions of the RTI Act.
6. OIC reopened the external review and I have considered the matter afresh. A considerable amount of information in issue at the outset of the review has been released to the applicant. As for the balance, I have decided:
 - not to deal with, or not to further deal with, part of the applicant’s external review application under section 94(1)(a) of the RTI Act, on the basis that it is frivolous, vexatious, misconceived or lacking in substance, as it relates to information and issues dealt with pursuant to a prior RTI access application and concluded external review
 - that certain pages fall outside the scope of the applicant’s access application, as pages coming within an exclusion stated by her in that application, or containing information unrelated to its terms, and may therefore be excluded from further consideration
 - that access may be refused to other information, on the basis it comprises legally privileged and therefore exempt information; and
 - that access may be refused to the remaining information, on the basis its disclosure would, on balance, be contrary to the public interest.

¹ Application dated 2 December 2010.

² External review application dated 4 April 2011, received 5 April 2011.

³ By decision dated 9 February 2012.

⁴ *Underwood and Department of Housing and Public Works; Minister for Housing and Public Works and Information Commissioner* (APL075-12), per Justice Cullinane. Three other matters were also remitted by way of this order, all of which have since been finalised by OIC: see *Underwood and Minister for Housing and Public Works* [2015] QICmr 27 (29 September 2015) (**Underwood and Minister**), *Underwood and Department of Housing and Public Works (No. 1)* [2016] QICmr 11 (17 March 2016) (**Underwood (No. 1)**), and *Underwood and Department of Housing and Public Works (No. 2)* [2016] QICmr 36 (15 September 2016) (**Underwood (No. 2)**).

Background

7. The period between OIC's Original Decision and this decision has seen various machinery of government changes. The respondent agency is now the Department of Housing and Public Works (HPW).
8. Significant procedural steps are set out in Appendix 1 to these reasons.

Reviewable decision

9. The decision under review is the Deemed Refusal taken to have been made on 31 March 2011.⁵

Material considered

10. The evidence, submissions, legislation and other material I have considered in reaching this decision are disclosed in these reasons (including footnotes and appendices).

Information in issue

11. HPW identified 2444 pages relevant to the applicant's access application. HPW agreed to release a considerable number of these pages to the applicant during the course of this review, in full or part. Released information is not in issue. The information that remains in issue is identified in Appendix 2.
12. Despite the release of information noted above, there still remains a large volume of information in issue in this review. Given this, I have adopted a degree of generalisation in these reasons. This is in keeping with the approach to voluminous applications endorsed by Woodward J of the Federal Court of Australia in *News Corporation Ltd & Ors v National Companies and Securities Commission*,⁶ His Honour observing that: '*... if the Freedom of Information legislation is to remain workable, it must be open to a respondent, and to the AAT [and by extension OIC, as the relevant agency of independent review], to deal with large numbers of documents with a degree of generalization appropriate to the case.*'⁷

Procedural issues

Request for submissions

13. The applicant requested⁸ that she be provided with any agency submissions lodged with OIC. Exercising the discretion under 95(1)(a) of the RTI Act, I have declined to do so, in order that participants may focus on issues salient to the review, to ensure compliance with section 108 of the RTI Act, and to endeavour to resolve this matter as expeditiously as possible.⁹ I have nevertheless ensured that the applicant has been advised of any preliminary view I have formed in the course of the review, where such view has been adverse to her interests, and apprised her of the material on which I have based such a view. I am satisfied that the applicant has been afforded procedural fairness in the circumstances of this review.

⁵ Notice of which was given to the applicant by letter from Communities dated 4 April 2011.

⁶ (1984) 57 ALR 550.

⁷ At 562.

⁸ Submissions dated 5 April 2017.

⁹ A position consistent with that adopted by OIC and explained to the applicant in related reviews: see, for example, *Underwood and Minister* at [18]-[19], and *Underwood (No. 1)* at [15]-[16].

Time allowed for making submissions and general procedural complaints

14. By letter dated 9 February 2017, I wrote to the applicant conveying my preliminary view on the issues in this external review, and inviting her to make submissions in reply by 9 March 2017. I also advised in this letter that OIC would be prepared to allow any reasonable request for extra time, should the applicant require it.
15. By letter dated 21 February 2017, the applicant requested until 6 April 2017 to lodge submissions. I replied the same day, allowing the applicant the additional time she had requested.
16. The applicant subsequently lodged her submissions with OIC on 5 April 2017. Those submissions raise a number of complaints and issues about the external review process, and the past processing of related applications made by her to OIC. Accordingly, not all of these submissions are relevant to the present review and it is often difficult to determine which parts are directly relevant to the issues I am required to decide.
17. One part of the applicant's 5 April 2017 submissions could, however, arguably be construed as a contention that OIC has not afforded the applicant enough time to prepare an adequate reply to my letter dated 9 February 2017. If so, this does not reflect my having allowed the applicant a month to reply to my 9 February 2017 letter and advising her of my preparedness to entertain requests for additional time, and immediately acceding to such a request when it was made in her 21 February 2017 letter. It would also seem to be contradicted by the statement later in the applicant's 5 April 2017 submissions that she was '*...not going to waste any more time regarding this submission...*'.
18. The applicant's 5 April 2017 submissions also raise the length of time taken to progress this review. I recognise that the review process has been lengthy. However, I am confident that OIC has progressed this matter in as timely a manner as possible, in view of the volume of documents in issue in both this review and the applicant's related reviews (many of which were released to the applicant through the course of these reviews, as a consequence of the external review process), and the fact that this application was one of many competing for the allocation of the finite resources available to OIC for the purposes of resolving external review applications.
19. I am satisfied that I have allowed the applicant adequate time – and/or the opportunity of adequate time – to put her case in this review.
20. The applicant's 5 April 2017 submissions further contain various complaints as to OIC's procedure in this review, including alleged 'failure to consult' and lack of procedural fairness, apparently stemming from the imposition by OIC of deadlines for replying to correspondence. In reply, it is sufficient to note that the procedure to be adopted on an external review is at OIC's discretion.¹⁰ OIC is obliged to afford participants procedural fairness, and I am satisfied that this has been done in the circumstances of this case, and reject the suggestion that the imposition of timeframes on parties of itself amounts to a denial of natural justice, particularly in circumstances where, as here, such timeframes were open to negotiation.
21. Additionally, the applicant's 5 April 2017 submissions contain an insistence that previous submissions made by her in related external reviews remitted by order of QCAT and since finalised by OIC '*...are to be included in their entirety in this submission*'. It is important to note that the applicant lodged an extensive amount of material in the course of all matters, including those earlier reviews, a considerable proportion of which is directed to matters

¹⁰ Section 95(1)(a) of the RTI Act. I advised the applicant of OIC's discretion in this regard by letter dated 8 September 2016, in reply to a letter from her dated 6 September 2016 concerning procedural matters.

having no bearing on the substantive issues to be determined in this particular review. These submissions are often discursive, and generally difficult to comprehend. Nevertheless, I have endeavoured to have regard to such material, to the extent it bears on any of the issues I am required to determine in this case.

22. Two such matters canvassed in earlier submissions are wholly procedural complaints, concerning the file or matter numbers used by OIC in identifying this and related reviews on their remittal from QCAT, and OIC's dealing with each of those remitted matters individually, rather than jointly. Each is adequately addressed in my decision in *Underwood and Minister*, the first, at paragraphs [13]-[17], the second, at [20]-[21]. I do not propose to extend this lengthy set of reasons by furthering engaging with what are peripheral issues, and simply adopt relevant reasoning from that earlier decision to the extent it may be necessary to do so. For the purposes of this decision, it is sufficient to note that there is no substance to any complaint about file numbering, and nothing precluding OIC from dealing with each remitted matter separately.
23. I will now address the substantive issues arising in this review.

Decision not to deal

24. As in *Underwood (No. 1)* and *Underwood (No. 2)*, a considerable number of the pages in issue in this review are duplicates or counterpart copies of documents dealt with previously under the RTI Act, as a result of an RTI access application made by the applicant to HPW dated 28 February 2011 and OIC's external review of HPW's decision on that access application. That earlier review – review no. 310671 – was finalised by way of formal decision: *Underwood and Department of Housing and Public Works (Underwood)*.¹¹ The schedule forming Appendix 2 to this decision cross-references pages in issue in this review against corresponding pages dealt with in review no. 310671.
25. Further, a number of pages partly disclosed to the applicant contain the names of private sector employees and a Tenants' Union of Queensland employee, each of which has been deleted from the copies disclosed to the applicant.¹² It was decided in *Underwood* that disclosure of these names would be, on balance, contrary to the public interest.¹³
26. For the reasons explained below, I decide not to deal with, or not to further deal with, the applicant's external review application in this review, to the extent it concerns 'repeat' information (**Repeat Information**) of the kind described in paragraphs 24 and 25 above.
27. Section 94(1)(a) of the RTI Act provides:
 - (1) *The information commissioner may decide not to deal with, or not to further deal with, all or part of an external review application if—*
 - (a) *the commissioner is satisfied the application, or the part of the application, is frivolous, vexatious, misconceived or lacking substance...*
28. The power prescribed in section 94(1)(a) of the RTI Act is applicable to the extent an external review applicant seeks information that has been dealt with under the RTI Act in

¹¹ (Unreported, Queensland Information Commissioner, 18 May 2012). The applicant's appeal of this decision to QCAT – APL184-12 – was dismissed on 23 October 2014.

¹² Also identified in Appendix 2.

¹³ See paragraphs [63]-[68] and [69]-[73].

the course of prior applications by that applicant.¹⁴ As the Deputy Information Commissioner has stated, an application of this kind:¹⁵

...would clearly be vexatious, and contrary to the principle that a decision by a court or tribunal resolves the issues in dispute between the parties. A litigant cannot seek multiple hearings of the same issues between parties - that is vexatious and oppressive to the other party and to the relevant court or tribunal, and unfair to other citizens waiting their turn to use the dispute resolution services, provided from public funds, by courts and tribunals.

29. Applying the above reasoning, to the extent that the applicant's external review application seeks to revisit information and issues dealt with previously under the RTI Act, I consider that it is frivolous, vexatious, misconceived or lacking in substance. Accordingly, I decide not to deal with, or not to further deal with that aspect of the applicant's application under section 94(1)(a) of the RTI Act, and therefore not to deal with, or not to further deal with, the Repeat Information, ie:

- repeat pages as identified in Appendix 2; and
- the names referred to in paragraph 25 above.

30. In forming this view, I have, as I did in *Underwood (No. 1)*, taken into account the fact that some of the documents with which I have decided not to deal¹⁶ – generally, counterpart emails as appearing in the 'mailboxes' of multiple recipients, or subsets of larger email chains – vary slightly from the corresponding documents dealt with pursuant to the applicant's access application ultimately the subject of review no. 310671. They relay, however, the same information and/or embody the same communication, differing only in insignificant and superficial respects.¹⁷ To the extent the applicant's review application seeks to press for access to such inconsequential information, I consider it frivolous.¹⁸ Further reviewing the decision under review as it relates to information and documents of this kind would – in view of the fact that the status of the substantive information they embody has been analysed and associated right of access questions previously resolved – constitute a repeat hearing of issues already determined. In the circumstances, it is my view that proceeding further in relation to such information would be '*vexatious and oppressive to the other party and to the relevant court or tribunal, and unfair to other citizens waiting their turn to use*' OIC's publicly-funded services.

31. I should also note that in making the finding stated in paragraph 29, I recognise that the access application ultimately the subject of the present external review was made to Communities, whereas the access application leading to external review no. 310671 was made to HPW. I do not consider this renders external review no. 310671 irrelevant for present purposes,¹⁹ nor precludes me from exercising the discretion conferred by section 94(1)(a) of the RTI Act. As I explained in *Underwood (No. 1)* (footnotes omitted):

¹⁴ *Price and Local Government Association of Queensland Inc* (S 111/01) (Unreported, Queensland Information Commissioner, 29 June 2001) (**Price and LGAQ**). This decision concerned section 77(1)(a) of the repealed *Freedom of Information Act 1992* (Qld) (**FOI Act**). I am satisfied that section 77(1)(a) of the FOI Act was the material equivalent of section 94(1)(a) of the RTI Act, differing only in superficial respects. The comments of the Deputy Information Commissioner in *Price and LGAQ* are therefore applicable in this case.

¹⁵ *Price and LGAQ*, at [15]. The Deputy Information Commissioner went on to note that '[i]t is equally vexatious and oppressive to agencies to make repeated applications for the same documents...': [16]. The notion that frivolous or vexatious conduct may incorporate 'oppressive' conduct as alluded to by the Information Commissioner in this passage has been recognised by the Court of Appeal: *Mudie v Gainriver Pty Ltd* (No 2) [2003] 2 Qd R 271, [36]-[37] (**Mudie v Gainriver**).

¹⁶ Or not to further deal.

¹⁷ Such as name of recipient, date of printing for the purposes of generating hard copies to collate in response to the applicant's applications, and/or in the text of automatically-generated disclaimer 'boilerplate'. The latter occasionally causes a line break and thus generates an additional page not mirrored in its 310671 equivalent. These extra pages contain nothing more than mere 'spillover' of such 'boilerplate' text.

¹⁸ Adopting the ordinary meaning of the word, which includes '*of little or no worth, weight or importance*': *Mudie v Gainriver*, at [35].

¹⁹ As asserted by the applicant in submissions made by her in *Underwood (No. 2)* – see footnote 20 of that decision.

26. *HPW was, at the time the applicant made the access applications noted in the preceding paragraph, providing legal services to Communities. Communities sought HPW's assistance in dealing with various issues concerning the applicant's tenancy – HPW was, in practical terms, Communities' 'in-house' legal advisor. Documents and information dealt with in the Concluded Review [ie, external review no. 310671] therefore essentially came from the legal files maintained by HPW in assisting Communities.*
27. *The Repeat Information in issue in this review comprises the 'flip side of the coin'; the same information, as created or received by Communities in seeking HPW's assistance. Duplicates and/or the substance of a considerable amount of the Repeat Information was, as discussed above, released to the applicant pursuant to her access application dated 28 February 2011 as lodged with HPW and through the Concluded Review that resulted. While I have not conducted an exhaustive re-examination of the issues determined in the Concluded Review, I have satisfied myself that where information was refused in that earlier and completed review, it was refused on grounds that would apply regardless of which agency held the documents.*
28. *It is also important to note that I am required to consider relevant facts and circumstances as they now stand, and as a result of machinery of government changes, the documents in issue in this review are HPW documents, and have been for some time. HPW was, by the time of the remitting order of Cullinane J, the relevant respondent in QCAT proceedings APL075-12. HPW is the respondent in this external review, is the agency that has collated and assessed all relevant information in response to the access application the subject of this review, and is the agency with whom OIC has conducted all meaningful liaison as regards refusal of access and disclosure. HPW is, in short, the respondent agency that did all the 'legwork' in the Concluded Review, and has done so again in response to the access and external review applications the subject of my review.*
29. *In summary, my view is that revisiting information and issues determined pursuant to the access and external review applications the subject of the Concluded Review would involve a further hearing of issues otherwise finally determined as between the applicant and HPW, the agency now responsible for relevant documents and for prosecuting a case in relation to same in this external review. This would give rise to a result that would be vexatious and oppressive to OIC, by requiring it to reconsider the same information and issues previously determined and resolved. Revisiting relevant issues would, I think it fair to conclude, also be unreasonable as regards HPW, by necessitating that it deal again in this review with matters resolved in the Concluded Review. Further, re-considering the Repeat Information may adversely impact other external review applicants seeking to avail themselves of OIC's finite, and publicly funded, resources.*
32. The circumstances concerning the Repeat Information in issue in this review are on 'all fours' with those relating to equivalent information analysed in the passages from *Underwood (No. 1)* extracted above. The above observations and findings are therefore equally applicable, and I adopt them for the purposes of this decision.²⁰

Information outside the scope of access application

33. In an annexure to her access application, the applicant stated that she sought access to information '*...excepting that already provided under previous applications ...IP0029/R0247 of 27 November 2009 and/or to be provided under application R0602 of 13 September 2010...*'.

²⁰As in *Underwood (No. 1)*, I have not conducted an exhaustive re-examination of the issues determined in review no. 310671, which, by necessitating a re-hearing of said issues would defeat the purpose of my invoking section 94(1)(a) of the RTI Act, and occasion the very prejudice to OIC and others my decision in this regard is intended to avoid. As in that case, however, I am satisfied that where information was refused in review no. 310671, it was refused on grounds that would apply regardless of which agency – Communities or HPW – held the documents.

34. A number of the pages in issue were previously released to the applicant pursuant to the applications referred to in the preceding paragraph. Accordingly, as information 'already provided under' applications R0247 and/or R0602, relevant pages²¹ fall within the exception expressly stated by the applicant in her access application. As she is not seeking access to these pages, they are therefore outside the scope of her access application and may be excluded from consideration in this external review.
35. Some other pages identified by HPW²² are entirely unrelated to the subject of the applicant's access application, and thus do not fall within its terms. They are outside the scope of the application and of this external review, and may also be excluded from further consideration.

Exempt information

36. The RTI Act gives people a right to access documents of government agencies.²³ This right is subject to other provisions of the RTI Act, including grounds on which access may be refused. Access may be refused to information, to the extent the information comprises 'exempt information'.²⁴ 'Exempt information' includes information that would be privileged from production in a legal proceeding on the ground of legal professional privilege.²⁵

Legal professional privilege

37. Legal professional privilege (**LPP**) attaches to confidential communications between a lawyer and client made for the dominant purpose of seeking or giving legal advice or professional legal assistance, or preparing for, or for use in or in relation to, existing or reasonably anticipated legal proceedings.²⁶
38. The privilege extends to copies of unprivileged documents made for the dominant purpose of obtaining legal advice²⁷ and to internal communications repeating legal advice, whether verbatim or in substance.²⁸
39. Relevant information – the '**Legal Information**' – is noted in Appendix 2. It generally comprises communications between Communities officers and Communities' legal service providers as employed by HPW,²⁹ and communications with Crown Law solicitors. These communications were made for the purposes of both advising on the management of the applicant's tenancy, and dealing with proceedings in the Queensland Civil and Administrative Tribunal (**QCAT**) arising as a consequence of that tenancy. Relevant pages (or parts of pages) generally consist of emails (including attachments) between Communities staff, HPW lawyers and Crown Law solicitors, conveying instructions, and requesting or providing legal advice (including internal agency communications forwarding, repeating or reiterating the substance of such legal advice). While some of the pages comprising the Legal Information may also include copies of documents that may not of themselves attract legal professional privilege, I am satisfied that relevant copies are privileged, as copies made for the dominant purpose of seeking or obtaining legal advice or obtaining material for use in litigation.

²¹ Identified in the schedule at Appendix 2, together with earlier file and page references.

²² Noted in Appendix 2.

²³ Section 23 of the RTI Act.

²⁴ Section 47(3)(a) of the RTI Act.

²⁵ Section 48 and schedule 3, section 7 of the RTI Act.

²⁶ *Esso Australia Resources Ltd v Commission of Taxation* (1999) 201 CLR 49; *Daniels Corporation International Pty Ltd v Australian Competition and Consumer Commission* (2002) 213 CLR 543 at 552.

²⁷ *Australian Federal Police v Propend Finance Pty Ltd* (1997) 188 CLR 501.

²⁸ *Brambles Holdings v Trade Practices Commission (No. 3)* (1981) 58 FLR 452 at pages 458-459; *Komacha v Orange City Council* (Unreported, Supreme Court of New South Wales, Rath J, 30 August 1979). Qualifications and exceptions to LPP – such as waiver and improper purpose – may in some cases raise a question as to whether information attracts or remains subject to LPP. There is nothing in any of the material before me to suggest any such qualification or exception applies in this case.

²⁹ As explained at paragraph 26 of *Underwood (No. 1)*, extracted above at paragraph 31.

40. I am satisfied that the Legal Information was created for the dominant purpose of obtaining professional legal assistance from independent legal advisors, for conveying that assistance, or for obtaining material for use in actual litigation.³⁰ There is nothing before me to suggest that it is anything other than confidential. It therefore attracts LPP.
41. The Legal Information is exempt information, to which access may be refused under sections 47(3)(a) and 48 of the RTI Act.

Contrary to public interest information

42. A further ground for refusing access to information under the RTI Act is where disclosure of the information would, on balance, be contrary to the public interest.³¹ In deciding whether disclosure would, on balance, be contrary to the public interest, the RTI Act requires a decision-maker to:
- identify any irrelevant factors and disregard them;
 - identify relevant public interest factors favouring disclosure and nondisclosure;
 - balance the relevant factors favouring disclosure and nondisclosure; and
 - decide whether disclosing the information would, on balance, be contrary to the public interest.³²
43. Schedule 4 of the RTI Act contains non-exhaustive lists of various factors that may be relevant in determining the balance of the public interest. I have carefully considered these lists, together with the applicant's submissions in this and related reviews,³³ in reaching my decision in this review.
44. There are four main categories of contrary to public interest information (**CTPI Information**) in issue in this review, as follows:
- Category 1: Public servant mobile telephone numbers
 - Category 2: Body corporate and private sector employee information (including several subcategories, described further below)
 - Category 3: Third party information; and
 - Category 4: Public servant information.
45. Appendix 2 references CTPI Information according to the above categories.

Consideration

46. I can identify no applicable irrelevant factors, and I have taken none into account in making my decision. I will now consider whether the balance of the public interest favours disclosure or nondisclosure of the CTPI Information.

³⁰ Noting that proceedings in administrative tribunals such as QCAT have been held to attract the privilege: *SZHWY v Minister for Immigration and Citizenship* (2007) 159 FCR 1; *Re Farnaby and Military Rehabilitation and Compensation Commission* (2007) 97 ALD 788; *VCA and Australian Prudential Regulation Authority* (2008) 105 ALD 236 (all three decisions concerning proceedings in the Administrative Appeals Tribunal); *Cianfrano v Director General, Attorney General's Department* [2008] NSWADTAP 10 at [16] (concerning proceedings in the former Administrative Decisions Tribunal of NSW).

³¹ Sections 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.

³² Section 49(3) of the RTI Act.

³³ Insofar as any of that material is relevant, noting my comments at paragraph 21.

Personal information and prejudice protection of an individual's right to privacy

47. As explained further below, much of the CTPI Information comprises the personal information of individuals other than the applicant. The RTI Act presumes that disclosure of personal information of this kind could reasonably be expected to give rise to a public interest harm.³⁴ 'Personal information' is:³⁵

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.

48. Additionally, disclosure of much of the CTPI Information could, for reasons elaborated further below, reasonably be expected to prejudice protection of an individual's right to privacy. This gives rise to a factor favouring nondisclosure.³⁶ The concept of 'privacy' is not defined in the RTI Act. It can, however, be viewed as the right of an individual to preserve their personal sphere free from interference from others.³⁷

Category 1: Mobile telephone numbers

49. Some of the CTPI Information comprises mobile telephone numbers of public servants. Having carefully considered the applicant's submissions and closely scrutinised the list of factors favouring disclosure in the public interest set out schedule 4, part 2 of the RTI Act, I can identify just the one consideration favouring disclosure of this information: the general public interest in promoting public access to government-held information.³⁸ I cannot see how disclosure of such limited and particular personal contact details could, for example, promote open discussion of public affairs,³⁹ contribute to positive and informed debate on important issues or matters of serious interest,⁴⁰ or contribute to innovation and the facilitation of research.⁴¹
50. Further, I am unable to ascertain how any of the public interest submissions raised in the applicant's various submissions could be meaningfully applied to the mobile telephone numbers of public servants.
51. I can, firstly, identify no objective evidence in any of the material before me of an 'abuse of power' or a 'criminal conspiracy' as asserted by the applicant in her application for external review, or of 'retaliation' or interference as alleged in her submissions dated 5 April 2017, and nothing whatsoever to support any claim that disclosure of **any** of the CTPI Information – ie, Categories 1-4 – could reasonably be expected to reveal or substantiate such claims.⁴²

³⁴ Schedule 4, part 4, section 6 of the RTI Act.

³⁵ Section 10 and schedule 6 of the RTI Act, and section 12 of the *Information Privacy Act 2009* (Qld) (**IP Act**).

³⁶ Schedule 4, part 3, item 3 of the RTI Act.

³⁷ See *Marshall and Department of Police* (Unreported, Queensland Information Commissioner, 25 February 2011) at [27] paraphrasing the Australian Law Reform Commission's definition of the concept in 'For your information: Australian Privacy Law and Practice' Australian Law Reform Commission Report No. 108 released 11 August 2008, at paragraph 1.56.

³⁸ Implicit in, for example, the objects of the RTI Act, and the pro-disclosure bias enshrined in section 44 of the RTI Act. I have discussed the application and weighting of this consideration again below in the context of certain other categories of information; however, to avoid any ambiguity, I am content to record that I accept it applies to favour disclosure of **all** CTPI Information. Given the nature of this information, and the circumstances in which it came into the possession of government, I am satisfied the consideration warrants, at its highest, only moderate weight (and in most cases much lower weight, as I have specified in various instances below).

³⁹ Schedule 4, part 2, item 1 of the RTI Act.

⁴⁰ Schedule 4, part 2, item 2 of the RTI Act.

⁴¹ Schedule 4, part 2, item 19 of the RTI Act.

⁴² And thus the factor favouring disclosure prescribed in schedule 4, part 2, item 6 of the RTI Act does not arise for consideration in this case, in relation to **any** of the CTPI Information.

52. Nor can I identify any evidence to suggest that the mobile telephone numbers comprising the Category 1 information are, for example, incorrect, misleading, irrelevant, or that they have been '*fabricated*'.⁴³ There is, further, nothing before me to explain how mere contact numbers could be said to be '*perpetuating and compounding one's persecution and prolific defamation*'⁴⁴ at all, let alone in a fashion so as to merit disclosure.
53. Additionally, it cannot be said that refusing the applicant access to this information means she is being '*denied*' the opportunity to have it amended, as asserted at paragraph 2 of the submissions annexed to her review application and raised again in her 5 April 2017 submissions. The right to amend information contained in section 41 of the IP Act only applies to an individual's own personal information, which these numbers are plainly not.
54. As for factors favouring nondisclosure, it is convenient here to refer to paragraphs 63-72 of my decision in *Underwood and Minister*, where I dealt with equivalent information. As I explained in that decision:

66. *A factor favouring nondisclosure arises where disclosure of information could reasonably be expected to prejudice the protection of an individual's right to privacy. OIC has previously found that disclosure of the mobile telephone numbers of public officers could reasonably be expected to lead to this prejudice. This is because such information allows officers to be contacted directly and outside of work hours. As the Assistant Information Commissioner has noted:*

I acknowledge that agency employees are provided with mobile telephones to perform work associated with their employment. However, I also consider that a mobile telephone number which allows an individual to be contacted directly and potentially outside of working hours, falls outside the realm of routine work information and attracts a certain level of privacy.

67. *I agree. As I have noted, disclosure of mobile telephone numbers permits potential contact with a public officer when off duty and/or engaged in private activity, thus giving rise to a reasonable expectation of intrusion into...the officer's private life or 'personal sphere'. (Footnotes omitted.)*⁴⁵

55. I adopt the above reasoning for the purposes of this case. Disclosure of the mobile telephone numbers in issue could reasonably be expected to prejudice the protection of associated individuals' right to privacy, giving rise to a factor favouring nondisclosure.⁴⁶
56. Prior to concluding discussion of this nondisclosure factor, I should note submissions made by the applicant in one of the earlier related reviews⁴⁷ which, while not expressly put by her again in this review, might be argued to be relevant in view of her request as noted in paragraph 21. The essence of these submissions – and their lack of merit – was captured by the Assistant Information Commissioner in *Underwood (No. 2)*:

61. *... the applicant appears to contest the application of this [the prejudice protection of privacy] nondisclosure factor, arguing that '[p]ublic service officers and/or others are not entitled to claim privacy when my privacy is not considered'. From her submissions, it appears the applicant may have taken umbrage at circulation of issues concerning her public tenancy amongst various officials with responsibility for community and public housing. There is no objective material before me, however, to*

⁴³ And there is therefore no basis to conclude that their disclosure could reasonably be expected to give rise to the factor favouring disclosure in schedule 4, part 2, item 12 of the RTI Act.

⁴⁴ As alleged at paragraph 1 of the annexure to the applicant's external review application dated 4 April 2011, and repeated across her submissions in related reviews: see, for example, *Underwood and Minister* at [64].

⁴⁵ The OIC decision noted at [66] of my decision in *Underwood and Minister* is *Kiepe and the University of Queensland* (Unreported, Queensland Information Commissioner, 1 August 2012), specifically [18]-[21]. The nested passage quoting the Assistant Information Commissioner appears at paragraph [20] of *Kiepe*.

⁴⁶ Schedule 4, part 3, item 3 of the RTI Act.

⁴⁷ Review no. 100103, resulting in the decision in *Underwood (No. 2)*.

suggest that such activity was anything other than ordinary, everyday administrative practice – certainly, outside the applicant’s various assertions and allegations, there is nothing in the information before me to suggest her ‘privacy’ has not been ‘considered.’

62. *In any event, the applicant’s contentions are strictly irrelevant to an application of the privacy nondisclosure factor. The factor arises for consideration in balancing the public interest where, as noted, disclosure of specific information could reasonably be expected to prejudice protection of an individual’s right to privacy – its operation is not contingent on another’s privacy having also been given due regard. (Footnotes omitted.)*
57. Insofar as I may be obliged to in this matter, I agree with and adopt the reasoning of the Assistant Information Commissioner as set out above. The privacy nondisclosure factor in schedule 4, part 3, item 3 of the RTI Act applies to the Category 1 information.
58. I turn then to balance relevant factors against one another. I give the general consideration favouring disclosure identified in paragraph 49 moderate weight, noting that there are no broader accountability or transparency issues standing to be advanced by disclosure of public servant mobile telephone numbers.
59. Weighing against disclosure is the public interest in avoiding prejudice to the protection of an individual’s right to privacy. There is a clear public interest in ensuring that government respects personal privacy, including the privacy of its employees. I accord this consideration significant weight.
60. Balancing relevant factors against one another, I consider the significant public interest in safeguarding individual privacy outweighs the general public interest in promoting access to government-held information. As the Assistant Information Commissioner observed in *Underwood (No 2)*:
- ...government is the custodian of a mass of information relating to the community, and the general public interest in promoting access to information it holds will often conflict with and, generally, yield to specific public interests, such as the public interest in protecting personal privacy. This is such a case.*
61. This, too, is such a case. Disclosure of the public servant mobile numbers in issue would, on balance, be contrary to the public interest. For the reasons explained above, access may be refused to the Category 1 information.⁴⁸

Category 2: Body corporate and private sector employee information

62. The information in issue includes various documents relating to the management of the body corporate for the unit complex in which the applicant formerly resided. Some of these documents contain contrary to public interest information, generally:
- a) names and identifying particulars⁴⁹ of private lot owners/occupants and information disclosing their dealings with their properties, such as the manner in which those owners voted on body corporate matters
 - b) financial information concerning amounts payable by lot owners and the body corporate representing those owners
 - c) names and personal particulars⁵⁰ of employees of private entities, such as the strata title management company engaged to manage the body corporate and its contractors; and

⁴⁸ Under section 47(3)(b) of the RTI Act.

⁴⁹ Including mobile telephone numbers.

⁵⁰ Eg, mobile telephone numbers and signatures.

- d) financial and operational information concerning the strata management company's fees and services and contractors to the body corporate.

(a)-(b) Lot owner names/financial information

63. As with the Category 1 information, I have carefully considered the information comprising Categories 2(a)-(b), the applicant's submissions, and the list of factors favouring disclosure set out in schedule 4, part 2 of the RTI Act. Again, the only consideration that I can identify operating to favour disclosure of these latter categories of information is the general public interest in promoting community access to government-held information.
64. There is nothing at all before me to suggest that any of this purely factual information concerning private individuals is '*fabricated*', and/or incorrect, out of date, misleading etc, and therefore no basis on which to reasonably conclude that its disclosure would reveal same so as to enliven schedule 4, part 2, item 12 of the RTI Act.⁵¹ Nor is there anything to suggest that release of these categories might serve to advance public interest considerations such as enhancing government accountability,⁵² contributing to positive and informed debate on important issues or matters of serious interest,⁵³ or contributing to the maintenance of peace and order.⁵⁴
65. Additionally, as with the Category 1 information, I am unable to ascertain how release of what is relatively routine body corporate information could assist the applicant in redressing any alleged '*persecution and prolific defamation*' whatsoever, let alone to a degree warranting disclosure.
66. As for weighting, given the nature of the information comprising Categories 2(a)-(b) – private information concerning the personal and financial affairs of members of the general public, in the possession of government as an incidental consequence of its participation in the residential property market – the sole consideration favouring disclosure as identified in paragraph 63 warrants marginal weight.
67. Counting against disclosure is the fact that the Categories 2(a)-(b) information comprises the personal information of individual proprietors of units in the relevant complex,⁵⁵ and/or information disclosure of which could reasonably be expected to prejudice the protection of those proprietors' right to privacy. I am satisfied that an individual's ownership of residential property, their intentions as regards the management of such property, and the financial liabilities attending ownership, all comprise information falling within their 'personal sphere'. Given the nature of relevant information, these two considerations – the personal information public interest harm factor,⁵⁶ and the privacy nondisclosure factor⁵⁷ – each warrant substantial weight.
68. Balancing relevant factors against one another, I am satisfied that the disclosure of Categories 2(a)-(b) would, on balance, be contrary to the public interest. The general public interest in promoting access to government-held information, a consideration which, as noted, attracts only marginal weight in this case, should in my view be subordinated to the substantial public interest in safeguarding personal information and protecting individual privacy.

⁵¹ And again noting that refusing the applicant access to this information does not deny her any opportunity to have it amended, for the reasons explained at paragraph 53.

⁵² Schedule 4, part 2, item 1 of the RTI Act.

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

⁵⁴ Schedule 4, part 2, item 15 of the RTI Act.

⁵⁵ As it is information about individuals whose identity is apparent or could reasonably be ascertained from the information (eg, mobile telephone numbers, through calling same).

⁵⁶ Schedule 4, part 4, section 6 of the RTI Act.

⁵⁷ Schedule 4, part 3, item 3 of the RTI Act.

69. Accordingly, access to Categories 2(a)-(b) may be refused under section 47(3)(b) of the RTI Act.

(c) Employee names and personal particulars

70. Once again, having given all relevant material due consideration,⁵⁸ the only consideration favouring disclosure of this category of information that I can identify is the general public interest in advancing access to government-held information.⁵⁹ For reasons similar to those discussed above at paragraph 66, I accord this consideration marginal weight.

71. As for factors favouring nondisclosure, OIC has previously found⁶⁰ that the fact that an individual works for a private sector business is their personal information, giving rise to the public interest harm factor favouring nondisclosure⁶¹ and the related public interest nondisclosure factor intended to avoid prejudice to the protection of individual privacy.⁶² Applying that earlier reasoning, I am satisfied that each of these factors applies to the equivalent information in issue in the present case, disclosure of which would both identify individuals and link those individuals to their private employment.⁶³

72. As regards the weight to be accorded the factors telling against disclosure, there is, in my view, a manifest and self-evident public interest in ensuring that government protects personal information and the privacy of private citizens. Accordingly, I am satisfied that each factor attracts substantial weight.

73. To balancing, and the marginally-weighted general public interest in furthering community access to government-held information is in my view insufficient to displace the substantial public interests in protecting against prejudice to other individuals' privacy and safeguarding personal information held by government. Accordingly, disclosure of relevant names and related information would, on balance, be contrary to the public interest, and access to this information may be refused under section 47(3)(b) of the RTI Act.

d) Strata management company fee/services information

74. This information discloses fees payable by the body corporate of the unit complex in which the applicant was formerly housed to both:

- the strata company contracted to manage the body corporate's affairs; and
- maintenance contractors offering services to the body corporate.

75. This category also includes particulars of the strata company's service arrangements.

76. Once again, the general public interest in advancing access to government-held information operates to favour disclosure of this category of information. Given the nature of this information, however – information concerning the business affairs of private

⁵⁸ That is, the specific information itself, the applicant's submissions, and the list of factors favouring disclosure in the public interest set out in schedule 4, part 2 of the RTI Act.

⁵⁹ It being difficult to see how disclosure of the names of individuals employed outside the public sector could, for example, enhance government accountability or official transparency, and otherwise once again noting that there is no objective material before me to suggest relevant information is fabricated and/or in any way incorrect, out of date, misleading etc so as to support the application of schedule 4, part 2, item 12 of the RTI Act in favour of release.

⁶⁰ *Underwood*, at [67].

⁶¹ Schedule 4, part 4, section 6 of the RTI Act.

⁶² Schedule 4, part 3, item 3 of the RTI Act.

⁶³ Noting that I am satisfied that related personal particulars – eg signatures and mobile telephone numbers – comprise personal information for the purposes of the RTI Act, as information about individuals whose identity is apparent or could reasonably be ascertained from the information.

entities, in government possession as an incidental result of the latter's investment in the private real estate market – I afford that consideration only minor weight.

77. I also acknowledge that agencies are accountable for decisions to appoint and remunerate private contractors in relation to real property held by government, and recognise the public interest in disclosing information concerning government dealings with public housing properties, so as to ensure and enhance transparency and accountability of government expenditure and operations.⁶⁴
78. Communities was, however, one lot owner in a multi-unit complex, and therefore only partly responsible for decisions to engage and remunerate relevant contractors – diluting considerably relevant accountability and transparency interests. I am therefore of the view that applicable pro-disclosure factors warrant only marginal weight.
79. For reasons analogous to those explained above, and having reviewed all relevant material,⁶⁵ I can identify no other factors or considerations favouring disclosure of this category of information.⁶⁶
80. On the other hand, I am of the view that there are several factors favouring nondisclosure of this information.
81. Strata management and maintenance contracting are competitive industries. By revealing fees received, 'price-points' at which services are offered, and contracting quotes, disclosure could, in my view, reasonably be expected to assist competitors to compete with relevant entities more effectively in the strata management and maintenance contracting markets generally.
82. In the circumstances, I consider that disclosure of this category of information could reasonably be expected to prejudice relevant entities' business, commercial or financial affairs,⁶⁷ and to cause a public interest harm, by having an adverse effect on those affairs.⁶⁸ There is a legitimate public interest in ensuring that the affairs of private businesses are not unduly impacted or prejudiced by the mere fact that their information comes into the possession of government, via, as in this case, government participation in the private residential property market.
83. I acknowledge, however, that this information is now relatively aged, arguably diminishing its commercial sensitivity somewhat. In the circumstances, I afford the nondisclosure considerations discussed in the preceding paragraph moderate weight.
84. Balancing relevant factors against one another, my view is that the factors favouring disclosure are, when weighed against the factors favouring nondisclosure, insufficient to tip the balance of the public interest in favour of disclosure. I therefore find that disclosure of the Category 2(d) information would, on balance, be contrary to the public interest.

⁶⁴ Schedule 4, part 2, items 1, 3 and 4 of the RTI Act.

⁶⁵ That is, material and considerations as identified in paragraphs 49 and 63.

⁶⁶ There is nothing before me to support any assertion that this information is 'fabricated', and nothing to suggest it is anything other than correct, relevant etc (precluding application of schedule 4, part 2, item 12 of the RTI Act). Further, by its very nature, it would not appear to be information disclosure of which might advance public interest considerations favouring disclosure beyond those I have identified above. Additionally, it is plainly not personal information of the applicant that might be the subject of an application by her for its amendment.

⁶⁷ Schedule 4, part 3, items 2 and 15 of the RTI Act.

⁶⁸ Schedule 4, part 4, section 7(1)(c) of the RTI Act. The relevant information clearly concerns the business, professional, commercial or financial affairs of relevant entities, as required by schedule 4, part 4, section 7(1)(c)(i) of the RTI Act. A small segment appearing at the bottom of one of the body corporate pages (page 2388) also describes a familial relationship, thus comprising another individual's personal information and information disclosure of which would prejudice the protection of an individual's right to privacy. I can identify no public interest considerations of weight sufficient to displace the privacy interests attaching to this information, and thus access to it may in my view be refused under section 47(3)(b) of the RTI Act.

85. Accordingly, access to Category 2(d) may be refused, under section 47(3)(b) of the RTI Act.

Category 3: Third party information

86. The Category 3 information comprises information the disclosure of which could reasonably be expected to identify individuals other than the applicant, in a context concerning relevant individuals' complaints or approaches to Communities, interactions with Communities (including proposed interactions), and Communities' dealings with these individuals and their information. It includes information describing individual attitudes and opinions and personal and financial intentions, and information connecting individuals with assertions as to personal conduct.
87. I recognise the public interest in disclosing information that may assist to ensure public agencies operate transparently and accountably, and acknowledge that disclosure of these segments may, in some cases, assist the applicant to be fully apprised of issues concerning her tenancy, and Communities' management of same, arguably enlivening public interest factors set out in schedule 4, part 2, items 1, 3, and 11 of the RTI Act.
88. I consider, however, that applicable pro-disclosure public interests have been adequately served by disclosure to the applicant of information concerning relevant issues, and that she has been provided with sufficient information to allow her to understand those issues and Communities' handling of those matters. These pro-disclosure considerations therefore warrant a moderate weighting.
89. I also note that, as information concerning her tenancy, it is arguable that some of this information also comprises the applicant's personal information, giving rise to the factor favouring disclosure prescribed in schedule 4, part 2, item 7 of the RTI Act. This is an important public interest, warranting considerable weight. It is not possible, however, to separate this personal information from what, as I discuss further below, is the personal information of others. Disclosing it would therefore require disclosure of the personal information of persons other than the applicant, and would, as also discussed further below, prejudice protection of an individual's right to privacy.
90. As for factors favouring nondisclosure, as identifying information,⁶⁹ the Category 3 information comprises personal information of persons other than the applicant, giving rise to the public interest harm factor telling against disclosure.⁷⁰ It is also my view that information of this kind concerns the private aspects of an individual's life, and that disclosure could therefore reasonably be expected to prejudice protection of their right to privacy.⁷¹ Each deserves substantial weight.
91. Turning to the balancing exercise required of me, my view is that the substantially-weighted factors favouring nondisclosure outweigh all considerations operating in favour of disclosure of the Category 3 information. I am not persuaded that disclosure of the Category 3 information would materially advance the pro-disclosure public interest factors I have identified above; certainly, not to an extent sufficient to justify disclosure of the personal information of persons other than the applicant which this information comprises. As regards the fact that some information might be said to comprise the applicant's own personal information, taking into account all relevant circumstances, it is my view that the strong public interest in safeguarding personal information and avoiding prejudice to the

⁶⁹ Or information which discloses a relationship or proximity to the applicant which could reasonably be expected to identify other individuals.

⁷⁰ Schedule 4, part 4, section 6 of the RTI Act.

⁷¹ Schedule 4, part 3, item 3 of the RTI Act. OIC has previously found that a person's dealings with an agency concerns a central aspect of their 'personal sphere': *OP5BNI and Department of National Parks, Recreation, Sport and Racing* (Unreported, Queensland Information Commissioner, 12 September 2013) at [45].

protection of privacy of third parties should, in this case, be preferred to that favouring disclosure to an individual of their own personal information.

92. It is important here that I discuss in some depth the applicant's submissions⁷² that information may be '*fabricated*', and '*inaccurate, misleading and/or irrelevant*'. As noted above, a factor favouring disclosure of information will arise for balancing where disclosure of information could reasonably be expected to reveal that the information is incorrect, out of date, misleading, gratuitous, unfairly subjective or irrelevant.⁷³ As OIC observed in dealing with equivalent information in earlier related reviews,⁷⁴ there is, however, nothing before me to suggest that relevant information is incorrect, out of date, misleading, irrelevant etc. Much of it is merely factual matter – such as names – which clearly present as accurate and correct. As for more substantive 'complaint' information, OIC has found that this type of information:

... is by its very nature, an individual's particular version of events which is shaped by factors including the individual's memory and subjective impressions.

In my view, this inherent subjectivity does not necessarily mean that the resulting account or statement is incorrect, out of date, misleading, gratuitous, unfairly subjective or irrelevant. Rather, it means that complaint information comprises a personal interpretation of relevant events, which an investigator must balance against other (often competing) statements and evidence in reaching a conclusion in a particular case.⁷⁵

93. As in earlier matters, I agree with the above analysis, and am of the view that the relevant factor favouring disclosure does not arise for consideration in this case.⁷⁶
94. Nor does this appear, in my view, to be a case in which procedural fairness considerations or considerations concerning the administration of justice might arise to favour disclosure. This is because the substance of any matters potentially adverse to the applicant have either been disclosed to her pursuant to related RTI access applications, or in the course of this review.
95. For the sake of completeness, and bearing in mind once more the applicant's contention that I ought to have regard to all earlier arguments and submissions raised by her in other related reviews, I note that in *Underwood (No. 2)*, the Assistant Information Commissioner addressed a submission⁷⁷ that the applicant was '*being denied the right to have my side of the neighbourhood dispute placed on record.*' To the extent I may be obliged to deal with this submission, I rely on the reasoning⁷⁸ of the Assistant Information Commissioner:

It is not, in my view, necessary for the applicant to access third party personal information (nor any other information to which I have decided access may be refused) in order for her to put her 'side' of the dispute; indeed, the voluminous amount of correspondence lodged by her with Communities/HPW in relation to relevant 'neighbourhood' issues suggests she has not only enjoyed such a right, but exercised it vigorously. (Footnotes omitted.)

96. In the circumstances, I consider that the public interest in protecting privacy and safeguarding personal information should be preferred to any considerations favouring

⁷² As contained in the annexure to her external review application dated 4 April 2011.

⁷³ See, for example, note 43. To repeat, the factor is set out in schedule 4, part 2, item 12 of the RTI Act.

⁷⁴ See, for example, *Underwood (No. 2)*, at [80].

⁷⁵ *Matthews and Gold Coast City Council* (Unreported, Queensland Information Commissioner, 23 June 2011) at [17]-[18].

⁷⁶ I am further of the view that the applicant is not being denied any right to amend any information. Some of this information is plainly not her personal information (and thus not amenable to amendment – see above), while there is nothing to suggest any of it is inaccurate, incomplete, out of date or misleading, which is a ground for refusing a request for amendment: section 72(1)(a)(i) of the IP Act. I should also make clear that I can, having reviewed relevant material, identify no other factors favouring disclosure in the public interest beyond those discussed above, for reasons analogous to those set out above at paragraphs [49]-[52] and [63]-[64].

⁷⁷ In the context of the equivalent of the Category 3 information in this review.

⁷⁸ Set out at [73].

disclosure of the Category 3 information. As I recorded in refusing access to analogous information in *Underwood (No. 1)* (footnotes omitted):⁷⁹

Members of the public are generally entitled to expect that personal information collected from them by government agencies will be handled appropriately, and not subject to routine and unconditional disclosure to others. Safeguarding individual privacy and avoiding public interest harm by protecting personal information are public interest considerations warranting relatively substantial weight, and which outweigh any considerations favouring disclosure in this case.

97. Disclosure of the Category 3 information would, on balance, be contrary to the public interest. Access to this information may therefore be refused under section 47(3)(b) of the RTI Act.

Category 4: Public servant information

98. The Category 4 information comprises the responses of public officers to complaints made by the applicant, and ancillary information generated during the course of a formal complaint investigation process arising from those complaints.
99. There is nothing before me to suggest that any information in this category is incorrect, misleading etc, and thus no basis to contemplate schedule 4, part 2, item 12 of the RTI Act in balancing the public interest. Insofar as this information comprises subjective opinion and impression, it is of a piece with the information discussed in paragraphs [92]-[93], and the reasoning and findings set out there apply. Apart from the general public interest in promoting access to government-held information (which, as regards this Category, I attribute only moderate weight, given its nature as information concerning individual employees), I can identify no other considerations or factors favouring disclosure of the Category 4 information, beyond those discussed in this and the following two paragraphs.
100. I acknowledge the public interest in enhancing the accountability of agencies for the manner in which they investigate and resolve complaints against staff, and the transparency of the complaints management process. I also recognise that disclosure may reveal some of the background or contextual information relied on by Communities in dealing with the applicant's complaint.⁸⁰ I understand that Communities did, however, provide the applicant with a detailed account of its investigation and findings,⁸¹ which, coupled with information disclosed to her to date through this and her various other RTI applications in my view largely satisfies relevant transparency and accountability interests. Relevant accountability and transparency considerations therefore warrant only moderate weight.
101. I also recognise that, as information generated in direct response to complaints levelled by the applicant, some of this information comprises her personal information,⁸² an important public interest consideration deserving of not-insignificant weight. However, this information is, as discussed further below, the personal information of persons other than the applicant. Disclosing it would, therefore, entail disclosure to the applicant of the personal information of other individuals. As outlined below, the information is relatively sensitive in nature. Bearing this in mind – and the fact that Communities gave the applicant a substantial account of the investigation process and its outcome – my view is that considerations favouring disclosure are not of sufficient weight to override the considerations favouring nondisclosure identified and discussed below.

⁷⁹ At [76].

⁸⁰ Schedule 4, part 2, item 11 of the RTI Act.

⁸¹ Drafts of which were also released during the course of this external review – see, for example, pages 9-13.

⁸² Remembering that this is a factor favouring disclosure: schedule 4, part 2, item 7 of the RTI Act.

102. Turning then to factors favouring nondisclosure, as identifying information and opinion, this information comprises the personal information of relevant officers, disclosure of which would therefore give rise to a public interest harm.⁸³ I also consider that disclosure of at least some of it – revealing as it would information going beyond mere routine work information, including individuals’ emotional states, and personal feelings and opinions about, and impressions of, relevant events – would unjustifiably intrude into the ‘personal sphere’ of relevant individuals, and thus prejudice protection of these officers’ right to privacy.⁸⁴ These considerations deserve significant weight, particularly in view of the fact that relevant complaints were, as I understand, found to be largely unsubstantiated.
103. Further, I consider that disclosure of any of this Category 4 information could reasonably be expected to prejudice HPW’s (and Communities’) management functions.⁸⁵ The information discloses, as I have noted, personal feelings and emotions of particular officers, and includes frank observations and opinions concerning internal workplace relationships, all made in the context of a formal investigation process. I consider that release of such information could reasonably be expected to undermine staff confidence in agency investigation processes and – by revealing personal attitudes, opinions and feelings – adversely affect staff morale, thereby impairing the agency’s ability to manage staff. I give this consideration substantial weight.
104. As alluded to in paragraph 101, on balancing all relevant considerations against one another, I am of the view that factors and considerations favouring disclosure of the Category 4 information are insufficient to displace the significant and substantial public interest considerations favouring nondisclosure. Disclosure of this information would, on balance, be contrary to the public interest, and access to it may therefore be refused under section 47(3)(b) of the RTI Act.

CTPI Information – concluding comments

105. I acknowledge that the applicant may be aware of a considerable amount of information concerning identities and events to which parts of the CTPI Information relate, as a consequence of information released to her pursuant to various RTI access applications and of her intimate involvement in events to which relevant segments contained in that information pertain. In these circumstances, it is arguable that the privacy interests attaching to some of the personal information embodied in the CTPI Information may not be of the same magnitude as might ordinarily be the case.
106. Despite this, members of the community are, as I have noted above, entitled to expect that their personal information as held by a government agency will not be subject to unconditional disclosure to others. In the circumstances, my view is that relevant factors favouring nondisclosure discussed above retain sufficient weight so as to justify refusal of access.
107. I would also stress that, if I were wrong in finding that some or all of the factors favouring disclosure canvassed above do not arise to be weighed in this case, I would give each low weight, and consider that the balance of the public interest would nevertheless remain in favour of nondisclosure of all of the CTPI Information in this case.

⁸³ Schedule 4, part 4, section 6 of the RTI Act.

⁸⁴ Schedule 4, part 3, item 3 of the RTI Act.

⁸⁵ A factor favouring nondisclosure: schedule 4, part 3, item 19 of the RTI Act.

Miscellaneous submissions

108. As a final matter, I should record that in my letter to the applicant dated 9 February 2017, I advised that I could identify nothing in the information before me to support the unsubstantiated assertion raised in paragraph 6 of the annexure to her application for external review that she was being '*denied access to documents not made available due to an insufficiency of search*'.
109. I further informed the applicant that in the absence of objective evidence supporting this claim, I did not propose to deal with relevant submissions any further.
110. The applicant has in her responses to my letter provided no such evidence that I can identify. There being no other probative material before me to support these claims, I pay them no further regard.⁸⁶

DECISION

111. I set aside the Deemed Refusal under review. In its place, I decide not to further deal with the applicant's application for external review under section 94(1)(a) of the RTI Act, insofar as it seeks to revisit the Repeat Information. I further find that:
- some information falls outside the scope of the access application and this external review; and
 - access to information may be refused under sections 47(3)(a) and 47(3)(b) of the RTI Act, in accordance with these reasons for decision.
112. I have made this decision as a delegate of the Information Commissioner, under section 145 of the RTI Act.

Clare Smith
Right to Information Commissioner

Date: 20 April 2017

⁸⁶ Noting that as regards 'sufficiency of search' or missing documents claims, an applicant asserting same bears responsibility for establishing that reasonable grounds exist to suspect the existence of missing documents: *Gapsa and Public Service Commission* [2016] QICmr 6 (11 February 2016) at [15].

APPENDIX 1**Significant procedural steps**

External review 310595	
Date	Event
2 December 2010	Communities received the access application under the RTI Act.
31 March 2011	Communities did not make a decision within the relevant timeframe and the principal officer of Communities was taken to have refused access to the requested information under section 46(1) of the RTI Act.
4 April 2011	Communities notified the applicant of the deemed decision taken to have been made under section 46(1) of the RTI Act.
5 April 2011	OIC received the application for external review of the deemed decision.
20 June 2011	OIC received submissions from the applicant.
23 November 2011	OIC issued a preliminary view to the applicant and invited her to provide submissions in support of her case if she did not accept the preliminary view.
8 December 2011	OIC received the applicant's submissions in response to the preliminary view.
9 February 2012	OIC decided not to further deal with the applicant's external review application, finalising external review no. 310595.
External review 100105 (remitted matter 310595)	
Date	Event
23 October 2014	QCAT set aside OIC's decision dated 9 February 2012, and remitted the matter to OIC. OIC opened review no. 100105.
24 December 2014	OIC asked HPW to provide submissions.
13 January 2015	OIC advised the applicant it had opened file no. 100105 (remitted matter 310595).
22 January 2015, 3 March 2015	HPW requested and was granted by OIC extensions of time in which to provide its submissions.
19 March 2015	OIC updated the applicant on progress in the review.
31 March 2015	HPW provided requested submissions.
30 April 2015	HPW advised OIC it wished to amend its submissions.
5 May 2015	OIC acknowledged HPW's request to amend its submissions, and requested advice as to when amendments might be complete.
7 May 2015	OIC updated the applicant on the status of the review.
13, 14 May 2015	HPW advised OIC as to an estimated date for amending its submissions.
14 May 2015	OIC wrote to the applicant, advising of the status of the review and requesting the applicant confirm that she wished to proceed with the review.
25 May 2015	The applicant confirmed she wished to proceed with the review.
29 May 2015	OIC received amended submissions from HPW.
21 July 2015	OIC requested HPW release information to the applicant.
23 July 2015	HPW advised OIC of its preparedness to release information, as requested by OIC.

Date	Event
10 September 2015, 10 November 2015	OIC updated the applicant on the status of the review.
3 December 2015	OIC issued a preliminary view to HPW as to the status of the information in issue and requested HPW's position in reply by 11 January 2016.
9 December 2015	OIC requested HPW defer supplying its reply to OIC's 3 December 2015 preliminary view, pending OIC's re-assessment of that preliminary view.
18 February 2016	OIC issued a revised preliminary view to HPW, requesting a reply by 31 March 2016.
31 March 2016	HPW requested additional time to reply to OIC's revised preliminary view, to 29 April 2016.
1 April 2016	OIC approved HPW's request for additional time.
28 April 2016	HPW made a further request for additional time to reply to OIC's revised preliminary view, to 27 May 2016. OIC approved HPW's request for additional time.
18 May 2016	OIC received HPW's reply to OIC's revised preliminary view
28 June 2016	OIC wrote to HPW in reply to HPW's 18 May 2016 correspondence, requesting advice by 12 July 2016.
4 July 2016	HPW sought clarification of issues raised in OIC's 28 June 2016 correspondence, and seeking confirmation of an extension of time to reply to that correspondence to 26 July 2016.
7 July 2016	OIC confirmed HPW's requested extension of time, to 26 July 2016, in which to reply to OIC's 18 May 2016 correspondence.
12 July 2016	OIC further clarified with HPW issues raised in OIC's 28 June 2016 correspondence. HPW sought and received an extension of time to 11 August 2016 to reply to that letter.
18 August 2016	OIC received HPW's reply (dated 12 August 2016). OIC wrote to the applicant concerning the status of the review.
6 September 2016	The applicant wrote to OIC concerning procedural issues.
8 September 2016	OIC replied to the applicant's 6 September 2016 letter. OIC wrote to HPW, concerning the status of the information in issue and aspects of HPW's treatment of same.
9 September 2016	HPW replied to OIC's 8 September 2016 letter.
13 September 2016	OIC wrote to HPW, concerning the status of the information in issue.
15 September 2016	HPW replied to OIC's 13 September 2016 letter. OIC wrote to HPW, requesting review and confirmation of information remaining in issue by 20 September 2016.
16 September 2016	HPW requested an extension until 5 October 2016 to reply to OIC's 15 September 2016 letter.
19 September 2016	OIC allowed the extension requested by HPW.
5 October 2016	HPW requested further time, to 11 November 2016, to reply to OIC's 15 September 2016 letter.
6 October 2016	OIC allowed the extension requested by HPW. OIC wrote to the applicant concerning the status of the review.

Date	Event
17 November 2016	HPW requested further time, to 24 February 2017, to reply to OIC's 15 September 2016 letter.
21 November 2016	OIC allowed HPW to 27 January 2017 to provide its reply.
3 January 2017	OIC received HPW's reply to OIC's 15 September 2016 letter.
9 February 2017	<p>OIC issued a preliminary view to the applicant that OIC intended not to deal further with part of her external review application, and that access may be refused to other information.</p> <p>OIC invited the applicant to provide submissions in support of her case.</p> <p>OIC requested HPW arrange for disclosure to the applicant of information to which it had agreed to grant access.</p>
21 February 2017	<p>The applicant requested an extension of time to reply to OIC's preliminary view.</p> <p>OIC granted the extension of time requested by the applicant.</p>
5 April 2017	OIC received the applicant's submissions in reply to OIC's 9 February 2017 preliminary view.

APPENDIX 2

Information in Issue

Page	310671 page no. (where relevant)	Decision
1		Released - not in issue
2		Part 94(1)(a) (name)
3		Segments 1-2: CTPI (Category 3) Balance: 94(1)(a) (name)
4		Segments 1-2, 8, 10, 15, 16, 19-21: CTPI (Category 3) Balance: 94(1)(a) (name)
5		Part CTPI (Category 3)
6		Released - not in issue
7		Part exempt: Legal Professional Privilege (LPP)
8		Released - not in issue
9		Released - not in issue
10		Released - not in issue
11		Released - not in issue
12		Released - not in issue
13		Released - not in issue
14	664-5	94(1)(a)
15	665-6	94(1)(a)
16		Part 94(1)(a) (name)
17	574, 663	94(1)(a)
18	575, 663	94(1)(a)
19	728	94(1)(a)
20	729	94(1)(a)
21	739	94(1)(a)
22	740	94(1)(a)
23	741	94(1)(a)
24		Full CTPI (Category 3)
25		Released - not in issue
26	691	94(1)(a)
27	692	94(1)(a)
28	693	94(1)(a)
29	694	94(1)(a)
30	695	94(1)(a)
31	677, 695	94(1)(a)
32	677, 696	94(1)(a)
33	678, 697	94(1)(a)
34	678, 698	94(1)(a)
35	679, 699	94(1)(a)
36	679, 700	94(1)(a)
37	680, 701	94(1)(a)
38	680, 702	94(1)(a)
39	681, 703	94(1)(a)
40	681, 704	94(1)(a)
41	682, 705	94(1)(a)
42	682, 706	94(1)(a)
43	683, 707	94(1)(a)
44	668-9	94(1)(a)
45	670, 708	94(1)(a)
46	670, 709	94(1)(a)
47	671, 710	94(1)(a)

Page	310671 page no. (where relevant)	Decision
48	671, 711	94(1)(a)
49	672, 712	94(1)(a)
50	672, 713	94(1)(a)
51	673, 714	94(1)(a)
52	673, 715	94(1)(a)
53	674, 716	94(1)(a)
54	674, 717	94(1)(a)
55	675, 718	94(1)(a)
56		Released - not in issue
57		Released - not in issue
58		Released - not in issue
59		Part CTPI (Category 1)
60		Part CTPI (Category 3)
61		Released - not in issue
62		Released - not in issue
63		Released - not in issue
64		Released - not in issue
65		Released - not in issue
66		Released - not in issue
67		Released - not in issue
68		Released - not in issue
69		Released - not in issue
70		Released - not in issue
71		Released - not in issue
72		Released - not in issue
73		Released - not in issue
74		Released - not in issue
75		Released - not in issue
76		Part CTPI (Category 1)
77		Part CTPI (Category 3)
78		Full CTPI (Category 4)
79		Full CTPI (Category 4)
80		Full CTPI (Category 4)
81		Full CTPI (Category 4)
82		Full CTPI (Category 4)
83		Full CTPI (Category 4)
84		Full CTPI (Category 4)
85		Full CTPI (Category 4)
86		Full CTPI (Category 4)
87		Full CTPI (Category 4)
88		Full CTPI (Category 4)
89		Full CTPI (Category 4)
90		Part CTPI (Category 3)
91		Part CTPI (Category 3)
92		Full CTPI (Category 3)
93		Released - not in issue
94		Full CTPI (Category 4)
95		Full CTPI (Category 4)
96		Full CTPI (Category 4)
97		Full CTPI (Category 4)
98		Full CTPI (Category 4)
99		Full CTPI (Category 4)
100		Full CTPI (Category 4)
101		Full CTPI (Category 4)

Page	310671 page no. (where relevant)	Decision
102		Released - not in issue
103		Released - not in issue
104		Released - not in issue
105		Part CTPI (Category 1)
106		Part CTPI (Category 1)
107		Released - not in issue
108		Part CTPI (Category 3)
109		Part CTPI (Category 3)
110		Released - not in issue
111		Released - not in issue
112		Released - not in issue
113		Released - not in issue
114		Released - not in issue
115		Part CTPI (Category 2(c))
116		Part CTPI (Category 2(c))
117		Released - not in issue
118		Part CTPI (Category 2(a))
119		Segment 1: CTPI (Category 3) Balance: CTPI (Category 2(c))
120		Released - not in issue
121		Released - not in issue
122		Released - not in issue
123		Released - not in issue
124		Released - not in issue
125		Part CTPI (Category 3)
126		Released - not in issue
127		Released - not in issue
128		Part CTPI (Category 1)
129		Released - not in issue
130		Released - not in issue
131		Segments 2-3: Exempt (LPP) Balance: CTPI (Category 3)
132		Part CTPI (Category 3)
133		Released - not in issue
134		Released - not in issue
135		Released - not in issue
136		Segments 2-3: Exempt (LPP) Balance: CTPI (Category 3)
137		Part CTPI (Category 3)
138		Part CTPI (Category 3)
139		Part CTPI (Category 1)
140		Released - not in issue
141		Released - not in issue
142		Released - not in issue
143		Released - not in issue
144		Part CTPI (Category 1)
145		Released - not in issue
146		Released - not in issue
147		Released - not in issue
148		Released - not in issue
149		Part CTPI (Category 3)
150		Part CTPI (Category 3)
151		Released - not in issue
152		Prior release, not sought by applicant: R0602 File03 24-28

Page	310671 page no. (where relevant)	Decision
153		Prior release, not sought by applicant: R0602 File03 24-28
154		Prior release, not sought by applicant: R0602 File03 24-28
155		Prior release, not sought by applicant: R0602 File03 24-28
156		Prior release, not sought by applicant: R0602 File03 24-28
157		Prior release, not sought by applicant: R0247 File01 additional documents 7-13
158		Prior release, not sought by applicant: R0247 File01 additional documents 7-13
159		Prior release, not sought by applicant: R0247 File01 additional documents 7-13
160		Prior release, not sought by applicant: R0247 File01 additional documents 7-13
161		Prior release, not sought by applicant: R0247 File01 additional documents 7-13
162		Prior release, not sought by applicant: R0247 File01 additional documents 7-13
163		Prior release, not sought by applicant: R0247 File01 additional documents 7-13
164		Released - not in issue
165		Released - not in issue
166		Released - not in issue
167		Part CTPI (Category 3)
168		Released - not in issue
169		Segments 7-8: CTPI (Category 3) Balance: 94(1)(a) (name)
170		Part CTPI (Category 3)
171		Part CTPI (Category 3)
172		Part CTPI (Category 3)
173		Part CTPI (Category 3)
174		Part CTPI (Category 3)
175		Part CTPI (Category 3)
176		Part CTPI (Category 3)
177		Part CTPI (Category 3)
178		Part CTPI (Category 3)
179		Part CTPI (Category 3)
180		Part CTPI (Category 3)
181		Exempt: LPP
182		Exempt: LPP
183		Exempt: LPP
184		Exempt: LPP
185		Exempt: LPP
186		Exempt: LPP
187		Exempt: LPP
188		Exempt: LPP
189		Exempt: LPP
190		Exempt: LPP
191		Exempt: LPP
192		Exempt: LPP
193		Exempt: LPP
194		Exempt: LPP
195		Exempt: LPP
196		Exempt: LPP
197		Exempt: LPP
198		Exempt: LPP
199		Exempt: LPP
200		Exempt: LPP
201		Exempt: LPP
202		Exempt: LPP
203		Exempt: LPP
204		Exempt: LPP
205		Exempt: LPP

Page	310671 page no. (where relevant)	Decision
206		Exempt: LPP
207		Exempt: LPP
208		Exempt: LPP
209		Exempt: LPP
210		Exempt: LPP
211		Exempt: LPP
212		Exempt: LPP
213		Exempt: LPP
214		Exempt: LPP
215		Exempt: LPP
216		Exempt: LPP
217		Exempt: LPP
218		Exempt: LPP
219		Exempt: LPP
220		Exempt: LPP
221		Exempt: LPP
222		Exempt: LPP
223		Exempt: LPP
224		Part 94(1)(a) (name)
225		Part CTPI (Category 3)
226	727	Part 94(1)(a) (name)
227	728	94(1)(a)
228	729	94(1)(a)
229		Released - not in issue
230		Part 94(1)(a) (name)
231		Segments 1-2: 94(1)(a) (name) Balance: CTPI (Category 3)
232		Part 94(1)(a) (name)
233		Part 94(1)(a) (name)
234	574, 663	94(1)(a)
235	575, 663	94(1)(a)
236	664-5	94(1)(a)
237	665-6	94(1)(a)
238		Part exempt: LPP
239		Released - not in issue
240		Released - not in issue
241		Released - not in issue
242		Released - not in issue
243		Released - not in issue
244		Released - not in issue
245		Exempt: LPP
246		Exempt: LPP
247		Released - not in issue
248		Part 94(1)(a) (name)
249		Released - not in issue
250	730	Part 94(1)(a) (name)
251		Released - not in issue
252	574, 663	94(1)(a)
253	575, 663	94(1)(a)
254		Part CTPI (Category 3)
255		Released - not in issue
256		Full CTPI (Category 3)
257		Full CTPI (Category 3)
258		Full CTPI (Category 3)

Page	310671 page no. (where relevant)	Decision
259		Full CTPI (Category 3)
260		Full CTPI (Category 3)
261		Full CTPI (Category 3)
262	739	Segment 1: LPP Segment 2: 94(1)(a)
263	740	94(1)(a)
264	741	94(1)(a)
265	742	94(1)(a)
266		Part 94(1)(a) (name)
267		Part 94(1)(a) (name)
268		Released - not in issue
269		Exempt: LPP
270		Exempt: LPP
271		Exempt: LPP
272		Exempt: LPP
273	592	94(1)(a)
274	593	94(1)(a)
275	594	94(1)(a)
276	595	94(1)(a)
277	596	94(1)(a)
278	596	94(1)(a)
279	597	94(1)(a)
280	623	94(1)(a)
281	624	94(1)(a)
282	625	94(1)(a)
283	626	94(1)(a)
284	627	94(1)(a)
285		Exempt: LPP
286		Exempt: LPP
287		Exempt: LPP
288		Exempt: LPP
289		Exempt: LPP
290		Exempt: LPP
291		Exempt: LPP
292		Exempt: LPP
293		Exempt: LPP
294		Exempt: LPP
295		Exempt: LPP
296		Exempt: LPP
297		Exempt: LPP
298		Exempt: LPP
299		Exempt: LPP
300		Exempt: LPP
301		Exempt: LPP
302		Exempt: LPP
303		Exempt: LPP
304	611	94(1)(a)
305	612	94(1)(a)
306	613	94(1)(a)
307	614	94(1)(a)
308	615	94(1)(a)
309	616	94(1)(a)
310	617	94(1)(a)
311	N/A	94(1)(a)

Page	310671 page no. (where relevant)	Decision
312		Exempt: LPP
313		Exempt: LPP
314		Exempt: LPP
315		Exempt: LPP
316		Exempt: LPP
317		Exempt: LPP
318		Exempt: LPP
319		Exempt: LPP
320		Exempt: LPP
321		Exempt: LPP
322		Exempt: LPP
323		Exempt: LPP
324		Exempt: LPP
325		Exempt: LPP
326		Exempt: LPP
327		Exempt: LPP
328		Exempt: LPP
329		Exempt: LPP
330	599	94(1)(a)
331	600	94(1)(a)
332	601	94(1)(a)
333	602	94(1)(a)
334	603	94(1)(a)
335	604	94(1)(a)
336	605	94(1)(a)
337		Part CTPI (Category 3)
338		Released - not in issue
339		Part CTPI (Category 3)
340		Released - not in issue
341		Exempt: LPP
342		Exempt: LPP
343	551, 561, 580	94(1)(a)
344	552, 562, 581	94(1)(a)
345	553, 563, 582	94(1)(a)
346	554, 564, 583	94(1)(a)
347	555, 565, 584	94(1)(a)
348	556, 566, 585	94(1)(a)
349	557, 567, 586	94(1)(a)
350	558, 568, 587	94(1)(a)
351		Exempt: LPP
352		Exempt: LPP
353		Exempt: LPP
354		Exempt: LPP
355	549, 559	94(1)(a)
356	550, 560	94(1)(a)
357	551, 561, 580	94(1)(a)
358	552, 562, 581	94(1)(a)
359	553, 563, 582	94(1)(a)
360	554, 564, 583	94(1)(a)
361	555, 565, 584	94(1)(a)
362	556, 566, 585	94(1)(a)
363	557, 567, 586	94(1)(a)
364	558, 568, 587	94(1)(a)
365	501	94(1)(a)

Page	310671 page no. (where relevant)	Decision
366	502	94(1)(a)
367	503	94(1)(a)
368	N/A	94(1)(a)
369		Exempt: LPP
370		Exempt: LPP
371		Exempt: LPP
372	448	94(1)(a)
373	449	94(1)(a)
374	450	94(1)(a)
375	451	94(1)(a)
376	452	94(1)(a)
377	453	94(1)(a)
378	454	94(1)(a)
379	455	94(1)(a)
380	456	94(1)(a)
381	457	94(1)(a)
382	458	94(1)(a)
383	459	94(1)(a)
384	460	94(1)(a)
385	461	94(1)(a)
386	462	94(1)(a)
387	463	94(1)(a)
388	464	94(1)(a)
389	465	94(1)(a)
390	466	94(1)(a)
391	467	94(1)(a)
392	468	94(1)(a)
393	469	94(1)(a)
394	481/482	94(1)(a)
395	481/482	94(1)(a)
396		Exempt: LPP
397		Exempt: LPP
398		Exempt: LPP
399	549, 559	94(1)(a)
400	550, 560	94(1)(a)
401	551, 561, 580	94(1)(a)
402	552, 562, 581	94(1)(a)
403	553, 563, 582	94(1)(a)
404	554, 564, 583	94(1)(a)
405	555, 565, 584	94(1)(a)
406	556, 566, 585	94(1)(a)
407	557, 567, 586	94(1)(a)
408	558, 568, 587	94(1)(a)
409		Exempt: LPP
410		Exempt: LPP
411		Exempt: LPP
412		Exempt: LPP
413		Part 94(1)(a) (name)
414		Released - not in issue
415		Released - not in issue
416		Released - not in issue
417		Released - not in issue
418		Released - not in issue
419		Released - not in issue

Page	310671 page no. (where relevant)	Decision
420		Released - not in issue
421		Released - not in issue
422		Released - not in issue
423		Released - not in issue
424	490	94(1)(a)
425	491	94(1)(a)
426	492	94(1)(a)
427	493	94(1)(a)
428	494	94(1)(a)
429		Part CTPI (Category 3)
430		Part CTPI (Category 3)
431		Released - not in issue
432		Part 94(1)(a) (name)
433		Released - not in issue
434		Released - not in issue
435		Part CTPI (Category 3)
436		Part CTPI (Category 3)
437		Part CTPI (Category 3)
438		Released - not in issue
439		Part CTPI (Category 3)
440		Part CTPI (Category 3)
441		Part CTPI (Category 3)
442		Part CTPI (Category 3)
443		Part CTPI (Category 3)
444	438	94(1)(a)
445	439	94(1)(a)
446	440	94(1)(a)
447	441	94(1)(a)
448	442	94(1)(a)
449	426	94(1)(a)
450		Exempt: LPP
451		Segments 1-2: CTPI (Category 3) Segments 3-4: LPP
452		Segment 1: LPP Balance: CTPI (Category 3)
453		Released - not in issue
454		Part CTPI (Category 3)
455		Part CTPI (Category 3)
456		Part CTPI (Category 3)
457		Released - not in issue
458	391	94(1)(a)
459	392	94(1)(a)
460	N/A	94(1)(a)
461	387	94(1)(a)
462	389	94(1)(a)
463	381	94(1)(a)
464	382	94(1)(a)
465	383	94(1)(a)
466	355	94(1)(a)
467	356	94(1)(a)
468	357	94(1)(a)
469	358	94(1)(a)
470	359	94(1)(a)
471	360	94(1)(a)

Page	310671 page no. (where relevant)	Decision
472	361	94(1)(a)
473	362	94(1)(a)
474	363	94(1)(a)
475	345	94(1)(a)
476	346	94(1)(a)
477	347	94(1)(a)
478	348	94(1)(a)
479	349	94(1)(a)
480	N/A	94(1)(a)
481	499/500; 446/7	94(1)(a)
482	499/500; 446/7	94(1)(a)
483		Exempt: LPP
484		Exempt: LPP
485		Exempt: LPP
486		Exempt: LPP
487		Exempt: LPP
488		Exempt: LPP
489		Exempt: LPP
490		Exempt: LPP
491		Exempt: LPP
492		Exempt: LPP
493		Exempt: LPP
494		Exempt: LPP
495		Exempt: LPP
496		Exempt: LPP
497		Exempt: LPP
498		Released - not in issue
499		Part CTPI (Category 3)
500		Released - not in issue
501		Part exempt: LPP
502		Part CTPI (Category 3)
503		Released - not in issue
504		Part 94(1)(a) (name)
505		Segment 1: 94(1)(a) (name) Balance: CTPI (Category 3)
506	91, 260	94(1)(a)
507	92, 261	94(1)(a)
508	93, 262	94(1)(a)
509	94, 263	94(1)(a)
510	95, 264	94(1)(a)
511	265	94(1)(a)
512	266	94(1)(a)
513	267	94(1)(a)
514	268	94(1)(a)
515	269	94(1)(a)
516	270	94(1)(a)
517		Exempt: LPP
518		Exempt: LPP
519		Exempt: LPP
520		Exempt: LPP
521		Exempt: LPP
522		Exempt: LPP
523		Exempt: LPP
524		Exempt: LPP

Page	310671 page no. (where relevant)	Decision
525		Exempt: LPP
526	256	94(1)(a)
527	157	94(1)(a)
528	158	94(1)(a)
529	159	94(1)(a)
530	160	94(1)(a)
531	84, 162	94(1)(a)
532	85, 163	94(1)(a)
533	86, 164	94(1)(a)
534	87, 165	94(1)(a)
535	171	94(1)(a)
536	172	94(1)(a)
537	173	94(1)(a)
538	174	94(1)(a)
539	175	94(1)(a)
540	176	94(1)(a)
541	152	94(1)(a)
542	153	94(1)(a)
543	154	94(1)(a)
544	148	94(1)(a)
545	149	94(1)(a)
546	150	94(1)(a)
547	151	94(1)(a)
548		Released - not in issue
549		Released - not in issue
550		Part 94(1)(a) (name)
551		Part 94(1)(a) (name)
552		Part 94(1)(a) (name)
553		Released - not in issue
554	142	94(1)(a)
555	143	94(1)(a)
556	144	94(1)(a)
557	145	94(1)(a)
558	146	94(1)(a)
559	147	94(1)(a)
560		Exempt: LPP
561		Exempt: LPP
562		Released - not in issue
563		Released - not in issue
564		Part exempt: LPP
565		Released - not in issue
566		Released - not in issue
567		Released - not in issue
568		Released - not in issue
569		Released - not in issue
570		Released - not in issue
571		Released - not in issue
572		Released - not in issue
573		Released - not in issue
574		Released - not in issue
575		Released - not in issue
576		Released - not in issue
577		Released - not in issue
578		Released - not in issue

Page	310671 page no. (where relevant)	Decision
579		Released - not in issue
580		Released - not in issue
581		Released - not in issue
582		Released - not in issue
583		Released - not in issue
584		Released - not in issue
585		Released - not in issue
586		Part CTPI (Category 3)
587		Released - not in issue
588		Released - not in issue
589		Released - not in issue
590		Released - not in issue
591		Released - not in issue
592		Full CTPI (Category 3)
593		Part CTPI (Category 3)
594		Part CTPI (Category 3)
595		Full CTPI (Category 3)
596		Part CTPI (Category 3)
597		Part CTPI (Category 3)
598		Full CTPI (Category 3)
599		Part CTPI (Category 3)
600		Full CTPI (Category 3)
601		Part 94(1)(a) (name)
602	728	94(1)(a)
603	729	94(1)(a)
604		Part 94(1)(a) (name)
605		Part 94(1)(a) (name)
606		Released - not in issue
607		Part 94(1)(a) (name)
608		Part 94(1)(a) (name)
609		Part 94(1)(a) (name)
610		Part 94(1)(a) (name)
611		Released - not in issue
612		Released - not in issue
613	733-734	94(1)(a)
614	733-734	94(1)(a)
615		Segments 7-8: CTPI (Category 3) Balance: 94(1)(a) (name)
616		Part CTPI (Category 3)
617		Part CTPI (Category 3)
618		Part CTPI (Category 3)
619		Part CTPI (Category 3)
620		Part CTPI (Category 3)
621		Part CTPI (Category 3)
622		Part CTPI (Category 3)
623		Released - not in issue
624		Released - not in issue
625		Exempt: LPP
626		Exempt: LPP
627		Exempt: LPP
628		Exempt: LPP
629		Released - not in issue
630		Released - not in issue
631		Released - not in issue

Page	310671 page no. (where relevant)	Decision
632		Released - not in issue
633		Released - not in issue
634		Segments 1-2: (94(1)(a) (name) Balance: CTPI (Category 3)
635		Part 94(1)(a) (name)
636		Exempt: LPP
637		Exempt: LPP
638		Exempt: LPP
639		Exempt: LPP
640		Exempt: LPP
641		Exempt: LPP
642		Exempt: LPP
643		Exempt: LPP
644		Exempt: LPP
645		Part 94(1)(a) (name)
646		Part CTPI (Category 3)
647		Part 94(1)(a) (name)
648		Released - not in issue
649	728	94(1)(a)
650	729	94(1)(a)
651		Part 94(1)(a) (name)
652		Segments 1-2: (94(1)(a) (name) Balance: CTPI (Category 3)
653		Part 94(1)(a) (name)
654		Part exempt: LPP
655		Released - not in issue
656		Released - not in issue
657		Released - not in issue
658		Released - not in issue
659		Released - not in issue
660		Part 94(1)(a) (name)
661		Segments 1-2: (94(1)(a) (name) Balance: CTPI (Category 3)
662		Part 94(1)(a) (name)
663		Part exempt: LPP
664		Part exempt: LPP
665	665-666; 732-734	94(1)(a)
666	665-666; 732-734	94(1)(a)
667	664-666; 732-734	94(1)(a)
668	664-666; 732-734	94(1)(a)
669		Part exempt: LPP
670		Released - not in issue
671		Released - not in issue
672		Part exempt: LPP
673		Exempt: LPP
674		Exempt: LPP
675		Exempt: LPP
676		Part 94(1)(a) (name)
677		Final segment: 94(1)(a) (name) Balance: CTPI (Category 3)
678		Released - not in issue
679	739-742	94(1)(a)
680	739-742	94(1)(a)
681	739-742	94(1)(a)

Page	310671 page no. (where relevant)	Decision
682	739-742	94(1)(a)
683	739-742	94(1)(a)
684	739-742	94(1)(a)
685		Part CTPI (Category 3)
686		Full CTPI (Category 3)
687		Part 94(1)(a) (name)
688		Released - not in issue
689	574, 663	94(1)(a)
690	575, 663	94(1)(a)
691		Part CTPI (Category 3)
692		Released - not in issue
693		Released - not in issue
694		Part exempt: LPP
695		Released - not in issue
696		Part 94(1)(a) (name)
697		Part 94(1)(a) (name)
698		Part 94(1)(a) (name)
699		Part 94(1)(a) (name)
700		Released - not in issue
701		Exempt: LPP
702		Exempt: LPP
703		Exempt: LPP
704		Exempt: LPP
705	648	94(1)(a)
706	649	94(1)(a)
707	650	94(1)(a)
708	651	94(1)(a)
709	641	94(1)(a)
710	642	94(1)(a)
711	643	94(1)(a)
712	644	94(1)(a)
713	645	94(1)(a)
714	646	94(1)(a)
715	647	94(1)(a)
716		Released - not in issue
717		Released - not in issue
718		Part exempt: LPP
719		Part CTPI (Category 1)
720		Exempt: LPP
721		Exempt: LPP
722		Exempt: LPP
723		Exempt: LPP
724		Exempt: LPP
725	592, 628	94(1)(a)
726	593, 629	94(1)(a)
727	594, 630	94(1)(a)
728	595, 631	94(1)(a)
729	623	94(1)(a)
730	624	94(1)(a)
731	625	94(1)(a)
732	626	94(1)(a)
733	627	94(1)(a)
734		Released - not in issue
735		Exempt: LPP

Page	310671 page no. (where relevant)	Decision
736		Exempt: LPP
737		Exempt: LPP
738		Exempt: LPP
739		Released - not in issue
740		Part exempt: LPP
741		Exempt: LPP
742		Exempt: LPP
743		Exempt: LPP
744		Exempt: LPP
745		Released - not in issue
746		Released - not in issue
747		Released - not in issue
748		Exempt: LPP
749		Exempt: LPP
750		Exempt: LPP
751		Exempt: LPP
752		Exempt: LPP
753		Exempt: LPP
754		Exempt: LPP
755		Exempt: LPP
756		Exempt: LPP
757		Exempt: LPP
758		Exempt: LPP
759		Exempt: LPP
760		Exempt: LPP
761		Exempt: LPP
762		Exempt: LPP
763		Exempt: LPP
764		Exempt: LPP
765		Exempt: LPP
766		Exempt: LPP
767	599	94(1)(a)
768	600	94(1)(a)
769	601	94(1)(a)
770	602	94(1)(a)
771	603	94(1)(a)
772	604	94(1)(a)
773	605	94(1)(a)
774		Released - not in issue
775		Released - not in issue
776		Part CTPI (Category 3)
777		Released - not in issue
778		Part CTPI (Category 3)
779		Released - not in issue
780		Exempt: LPP
781		Exempt: LPP
782	551, 561, 580	94(1)(a)
783	552, 562, 581	94(1)(a)
784	553, 563, 582	94(1)(a)
785	554, 564, 583	94(1)(a)
786	555, 565, 584	94(1)(a)
787	556, 566, 585	94(1)(a)
788	557, 567, 586	94(1)(a)
789	558, 568, 587	94(1)(a)

Page	310671 page no. (where relevant)	Decision
790		Exempt: LPP
791		Exempt: LPP
792		Exempt: LPP
793		Exempt: LPP
794		Exempt: LPP
795		Exempt: LPP
796	549, 559	94(1)(a)
797	550, 560	94(1)(a)
798	551, 561, 580	94(1)(a)
799	552, 562, 581	94(1)(a)
800	553, 563, 582	94(1)(a)
801	554, 564, 583	94(1)(a)
802	555, 565, 584	94(1)(a)
803	556, 566, 585	94(1)(a)
804	557, 567, 586	94(1)(a)
805	558, 568, 587	94(1)(a)
806	739-742	Part 94(1)(a)
807	739-742	94(1)(a)
808	739-742	94(1)(a)
809	739-742	94(1)(a)
810		Exempt: LPP
811		Exempt: LPP
812		Exempt: LPP
813		Exempt: LPP
814		Exempt: LPP
815		Exempt: LPP
816		Exempt: LPP
817		Exempt: LPP
818		Exempt: LPP
819		Exempt: LPP
820		Exempt: LPP
821		Exempt: LPP
822		Exempt: LPP
823		Exempt: LPP
824		Exempt: LPP
825		Exempt: LPP
826		Exempt: LPP
827		Exempt: LPP
828		Exempt: LPP
829		Exempt: LPP
830		Exempt: LPP
831		Exempt: LPP
832		Exempt: LPP
833		Exempt: LPP
834		Exempt: LPP
835		Exempt: LPP
836		Exempt: LPP
837		Exempt: LPP
838		Exempt: LPP
839		Exempt: LPP
840		Exempt: LPP
841		Exempt: LPP
842		Exempt: LPP
843		Exempt: LPP

Page	310671 page no. (where relevant)	Decision
844		Exempt: LPP
845		Exempt: LPP
846		Exempt: LPP
847		Exempt: LPP
848		Exempt: LPP
849		Exempt: LPP
850		Exempt: LPP
851		Exempt: LPP
852		Exempt: LPP
853		Exempt: LPP
854		Exempt: LPP
855		Exempt: LPP
856	499/500; 446/7	94(1)(a)
857	499/500; 446/7	94(1)(a)
858	340	94(1)(a)
859	341	94(1)(a)
860	342	94(1)(a)
861	343	94(1)(a)
862	344	94(1)(a)
863	334	94(1)(a)
864	335	94(1)(a)
865	336	94(1)(a)
866	337	94(1)(a)
867	338	94(1)(a)
868	339	94(1)(a)
869		Full CTPI (Category 3)
870	499/500; 446/7	94(1)(a)
871	499/500; 446/7	94(1)(a)
872		Exempt: LPP
873		Exempt: LPP
874		Exempt: LPP
875		Released - not in issue
876	448	94(1)(a)
877	449	94(1)(a)
878	450	94(1)(a)
879	451	94(1)(a)
880	481/482	94(1)(a)
881	481/482	94(1)(a)
882		Part 94(1)(a) (name)
883		Exempt: LPP
884		Exempt: LPP
885		Exempt: LPP
886		Exempt: LPP
887		Exempt: LPP
888		Exempt: LPP
889		Exempt: LPP
890		Exempt: LPP
891		Exempt: LPP
892		Exempt: LPP
893		Part 94(1)(a) (name)
894	490	94(1)(a)
895	491	94(1)(a)
896	492	94(1)(a)
897	493	94(1)(a)

Page	310671 page no. (where relevant)	Decision
898	494	94(1)(a)
899		Part CTPI (Category 3)
900		Released - not in issue
901		Part exempt: LPP
902		Exempt: LPP
903		Exempt: LPP
904		Exempt: LPP
905		Part CTPI (Category 3)
906		Part CTPI (Category 3)
907		Part CTPI (Category 3)
908		Part CTPI (Category 3)
909		Part CTPI (Category 3)
910		Part CTPI (Category 3)
911		Released - not in issue
912		Part 94(1)(a) (name)
913		Released - not in issue
914		Part CTPI (Category 3)
915		Part CTPI (Category 3)
916		Part CTPI (Category 3)
917		Part CTPI (Category 3)
918		Released - not in issue
919		Released - not in issue
920		Part 94(1)(a) (name)
921		Released - not in issue
922		Released - not in issue
923		Part CTPI (Category 3)
924		Part CTPI (Category 3)
925		Part CTPI (Category 3)
926		Released - not in issue
927		Segments 1-2: CTPI (Category 2(c)) Segment 3: CTPI (Category 3)
928	903	94(1)(a)
929	904	94(1)(a)
930	905	94(1)(a)
931		Segments 1-2: CTPI (Category 2(c)) Segment 3: CTPI (Category 3)
932		Released - not in issue
933		Part CTPI (Category 3)
934		Released - not in issue
935		Part exempt: LPP
936		Exempt: LPP
937		Exempt: LPP
938		Exempt: LPP
939		Exempt: LPP
940		Segments 1-3: CTPI (Category 3) Segment 4: 94(1)(a) (name)
941	904	94(1)(a)
942		Released - not in issue
943		Part CTPI (Category 3)
944		Part CTPI (Category 3)
945		Part CTPI (Category 3)
946		Part CTPI (Category 3)
947		Part CTPI (Category 3)
948		Released - not in issue

Page	310671 page no. (where relevant)	Decision
949		Segments 1-2: CTPI (Category 3) Segment 3: LPP
950		Part CTPI (Category 3)
951		Part CTPI (Category 3)
952		Part CTPI (Category 3)
953		Part CTPI (Category 3)
954		Part CTPI (Category 3)
955	426	94(1)(a)
956		Exempt: LPP
957		Segments 1-2: CTPI (Category 3) Segments 3-4: LPP
958		Segment 3: LPP Balance: CTPI (Category 3)
959		Released - not in issue
960		Part CTPI (Category 3)
961		Part CTPI (Category 3)
962		Part CTPI (Category 3)
963		Released - not in issue
964		Exempt: LPP
965		Exempt: LPP
966		Exempt: LPP
967		Segments 1-3: CTPI (Category 2(a)) Segment 4: CTPI (Category 1)
968		Part CTPI (Category 2(a))
969		Segment 1: CTPI (Category 2(a)) Segment 4: CTPI (Category 1)
970	387	94(1)(a)
971	389	94(1)(a)
972	903	94(1)(a)
973	904	94(1)(a)
974	905	94(1)(a)
975	902	94(1)(a)
976	903	94(1)(a)
977	904	94(1)(a)
978	905	94(1)(a)
979		Full CTPI (Category 3)
980		Part CTPI (Category 3)
981		Part CTPI (Category 3)
982		Part 94(1)(a) (name)
983		Released - not in issue
984	902	94(1)(a)
985	903	94(1)(a)
986	904	94(1)(a)
987	905	94(1)(a)
988	906	94(1)(a)
989		Released - not in issue
990		Exempt: LPP
991		Exempt: LPP
992		Exempt: LPP
993	381	94(1)(a)
994	382	94(1)(a)
995	383	94(1)(a)
996		Released - not in issue
997		Part exempt: LPP

Page	310671 page no. (where relevant)	Decision
998		Exempt: LPP
999		Exempt: LPP
1000		Released - not in issue
1001		Exempt: LPP
1002		Exempt: LPP
1003		Exempt: LPP
1004	376	94(1)(a)
1005	377	94(1)(a)
1006	378	94(1)(a)
1007	379	94(1)(a)
1008		Segments 1-2: 94(1)(a) (name) Segment 3: CTPI (Category 2(a))
1009	360	94(1)(a)
1010	361	94(1)(a)
1011	362	94(1)(a)
1012	363	94(1)(a)
1013	N/A	94(1)(a)
1014	896	Part 94(1)(a) (name)
1015		Part CTPI (Category 2(c))
1016		Released - not in issue
1017		Released - not in issue
1018		Part exempt: LPP
1019		Exempt: LPP
1020		Released - not in issue
1021	899	94(1)(a)
1022	900	94(1)(a)
1023	901	94(1)(a)
1024	N/A	94(1)(a)
1025	355	94(1)(a)
1026	356	94(1)(a)
1027	357	94(1)(a)
1028	358	94(1)(a)
1029	359	94(1)(a)
1030	360	94(1)(a)
1031	361	94(1)(a)
1032	362	94(1)(a)
1033	363	94(1)(a)
1034	345	94(1)(a)
1035	346	94(1)(a)
1036	347	94(1)(a)
1037	348	94(1)(a)
1038	349	94(1)(a)
1039	N/A	94(1)(a)
1040		Exempt: LPP
1041		Exempt: LPP
1042	322	94(1)(a)
1043	323	94(1)(a)
1044	324	94(1)(a)
1045	325	94(1)(a)
1046	326	94(1)(a)
1047	327	94(1)(a)
1048		Released - not in issue
1049	314	94(1)(a)

Page	310671 page no. (where relevant)	Decision
1050	315	94(1)(a)
1051	316	94(1)(a)
1052	317	94(1)(a)
1053		Released - not in issue
1054		Exempt: LPP
1055		Exempt: LPP
1056		Exempt: LPP
1057		Exempt: LPP
1058		Exempt: LPP
1059		Part 94(1)(a) (name)
1060		Part 94(1)(a) (name)
1061		Segments 1-3: 94(1)(a) (name) Segment 4: CTPI (Category 2(a))
1062		Released - not in issue
1063		Released - not in issue
1064		Part 94(1)(a) (name)
1065		Part CTPI (Category 2(a))
1066		Released - not in issue
1067		Exempt: LPP
1068		Exempt: LPP
1069		Exempt: LPP
1070		Exempt: LPP
1071		Exempt: LPP
1072		Exempt: LPP
1073	300	94(1)(a)
1074	301	94(1)(a)
1075	302	94(1)(a)
1076		Part CTPI (Category 3)
1077		Released - not in issue
1078		Released - not in issue
1079		Released - not in issue
1080		Released - not in issue
1081		Released - not in issue
1082		Part CTPI (Category 3)
1083		Released - not in issue
1084		Released - not in issue
1085		Released - not in issue
1086		Part CTPI (Category 3)
1087		Released - not in issue
1088		Part exempt: LPP
1089		Part CTPI (Category 3)
1090		Released - not in issue
1091		Segment 1: 94(1)(a) (name) Balance: CTPI (Category 3)
1092		Segments 1-2: 94(1)(a) (name) Balance: CTPI (Category 3)
1093		Released - not in issue
1094		Part 94(1)(a) (name)
1095		Segment 1: 94(1)(a) (name) Balance: CTPI (Category 3)
1096		Segments 1-3: 94(1)(a) (name) Balance: CTPI (Category 3)
1097		Released - not in issue

Page	310671 page no. (where relevant)	Decision
1098		Segments 1-4, 9: 94(1)(a) (names) Balance CTPI: Category 3
1099		Segments 1-2, 5, 8 : 94(1)(a) (names) Balance CTPI: Category 3
1100		Segments 1-2 : 94(1)(a) (names) Balance CTPI: Category 3
1101		Released - not in issue
1102		Released - not in issue
1103		Full CTPI (Category 3)
1104		Exempt: LPP
1105		Exempt: LPP
1106		Exempt: LPP
1107		Exempt: LPP
1108		Exempt: LPP
1109		Exempt: LPP
1110		Exempt: LPP
1111		Exempt: LPP
1112		Exempt: LPP
1113		Released - not in issue
1114		Released - not in issue
1115		Released - not in issue
1116		Released - not in issue
1117		Released - not in issue
1118		Released - not in issue
1119	91, 260	94(1)(a)
1120	92, 261	94(1)(a)
1121	93, 262	94(1)(a)
1122	94, 263	94(1)(a)
1123	95, 264	94(1)(a)
1124		Full CTPI (Category 3)
1125		Full CTPI (Category 3)
1126		Full CTPI (Category 3)
1127		Exempt: LPP
1128		Exempt: LPP
1129		Exempt: LPP
1130		Exempt: LPP
1131		Exempt: LPP
1132		Exempt: LPP
1133		Exempt: LPP
1134		Part 94(1)(a) (name)
1135		Released - not in issue
1136		Exempt: LPP
1137		Exempt: LPP
1138		Exempt: LPP
1139		Exempt: LPP
1140		Exempt: LPP
1141		Exempt: LPP
1142		Part 94(1)(a) (name)
1143		Released - not in issue
1144		Released - not in issue
1145		Released - not in issue
1146		Released - not in issue
1147		Released - not in issue
1148		Part 94(1)(a) (name)

Page	310671 page no. (where relevant)	Decision
1149		Released - not in issue
1150		Part 94(1)(a) (name)
1151		Part 94(1)(a) (name)
1152		Released - not in issue
1153		Exempt: LPP
1154		Exempt: LPP
1155		Exempt: LPP
1156		Part 94(1)(a) (name)
1157		Part 94(1)(a) (name)
1158		Part 94(1)(a) (name)
1159		Part 94(1)(a) (name)
1160		Part 94(1)(a) (name)
1161		Part 94(1)(a) (name)
1162		Released - not in issue
1163		Part 94(1)(a) (name)
1164		Part 94(1)(a) (name)
1165		Part 94(1)(a) (name)
1166		Part 94(1)(a) (name)
1167		Exempt: LPP
1168		Exempt: LPP
1169		Exempt: LPP
1170		Exempt: LPP
1171		Part 94(1)(a) (name)
1172		Part 94(1)(a) (name)
1173		Part 94(1)(a) (name)
1174		Part 94(1)(a) (name)
1175		Released - not in issue
1176		Segments 3, 5-6: CTPI (Category 2(c)) Balance: 94(1)(a) (name)
1177		Part 94(1)(a) (name)
1178		Part 94(1)(a) (name)
1179		Part 94(1)(a) (name)
1180		Released - not in issue
1181	171	94(1)(a)
1182	172	94(1)(a)
1183	173	94(1)(a)
1184	174	94(1)(a)
1185	175	94(1)(a)
1186	176	94(1)(a)
1187		Exempt: LPP
1188		Exempt: LPP
1189		Exempt: LPP
1190		Part 94(1)(a) (name)
1191		Part 94(1)(a) (name)
1192		Part 94(1)(a) (name)
1193		Released - not in issue
1194		Released - not in issue
1195		Released - not in issue
1196		Part 94(1)(a) (name)
1197		Part 94(1)(a) (name)
1198		Part 94(1)(a) (name)
1199		Released - not in issue
1200		Released - not in issue
1201		Released - not in issue

Page	310671 page no. (where relevant)	Decision
1202		Part 94(1)(a) (name)
1203		Part 94(1)(a) (name)
1204		Part 94(1)(a) (name)
1205		Released - not in issue
1206		Exempt: LPP
1207		Exempt: LPP
1208		Exempt: LPP
1209		Exempt: LPP
1210		Exempt: LPP
1211		Exempt: LPP
1212		Exempt: LPP
1213		Released - not in issue
1214		Part exempt: LPP
1215		Released - not in issue
1216		Released - not in issue
1217		Part exempt: LPP
1218		Part exempt: LPP
1219		Released - not in issue
1220	129	94(1)(a)
1221	130	94(1)(a)
1222	131	94(1)(a)
1223	132	94(1)(a)
1224		Segments 1-2: CTPI (Category 3) Segment 3: LPP
1225		Part exempt: LPP
1226		Released - not in issue
1227		Released - not in issue
1228		Part CTPI (Category 3)
1229		Part exempt: LPP
1230		Part exempt: LPP
1231		Released - not in issue
1232		Part CTPI (Category 3)
1233		Part exempt: LPP
1234		Part exempt: LPP
1235		Released - not in issue
1236		Released - not in issue
1237		Part CTPI (Category 3)
1238		Segment 1: CTPI (Category 3) Segment 2: LPP
1239		Part exempt: LPP
1240		Released - not in issue
1241		Part CTPI (Category 3)
1242		Part CTPI (Category 3)
1243		Segments 1-2: CTPI (Category 3) Segment 3: LPP
1244		Part exempt: LPP
1245		Released - not in issue
1246		Released - not in issue
1247		Exempt: LPP
1248		Exempt: LPP
1249	125	94(1)(a)
1250	126	94(1)(a)
1251	126	94(1)(a)
1252		Released - not in issue

Page	310671 page no. (where relevant)	Decision
1253		Released - not in issue
1254		Part CTPI (Category 1)
1255		Part CTPI (Category 3)
1256		Released - not in issue
1257		Released - not in issue
1258		Released - not in issue
1259		Released - not in issue
1260		Released - not in issue
1261		Released - not in issue
1262		Released - not in issue
1263		Released - not in issue
1264		Released - not in issue
1265		Released - not in issue
1266		Released - not in issue
1267		Released - not in issue
1268		Released - not in issue
1269		Released - not in issue
1270		Released - not in issue
1271		Released - not in issue
1272		Part CTPI (Category 1)
1273		Part CTPI (Category 3)
1274		Released - not in issue
1275		Released - not in issue
1276		Released - not in issue
1277		Released - not in issue
1278		Released - not in issue
1279		Released - not in issue
1280		Released - not in issue
1281		Released - not in issue
1282		Released - not in issue
1283		Released - not in issue
1284		Released - not in issue
1285		Released - not in issue
1286		Released - not in issue
1287		Released - not in issue
1288		Part 94(1)(a) (name)
1289		Released - not in issue
1290		Released - not in issue
1291		Released - not in issue
1292		Released - not in issue
1293		Released - not in issue
1294		Released - not in issue
1295		Released - not in issue
1296		Released - not in issue
1297		Released - not in issue
1298		Released - not in issue
1299		Released - not in issue
1300		Released - not in issue
1301		Released - not in issue
1302		Released - not in issue
1303		Released - not in issue
1304		Released - not in issue
1305		Released - not in issue
1306		Released - not in issue

Page	310671 page no. (where relevant)	Decision
1307		Released - not in issue
1308		Released - not in issue
1309		Released - not in issue
1310		Released - not in issue
1311		Released - not in issue
1312		Released - not in issue
1313		Released - not in issue
1314		Released - not in issue
1315		Released - not in issue
1316		Released - not in issue
1317		Released - not in issue
1318		Released - not in issue
1319		Released - not in issue
1320		Released - not in issue
1321		Released - not in issue
1322		Released - not in issue
1323		Released - not in issue
1324		Released - not in issue
1325		Part 94(1)(a) (name)
1326		Released - not in issue
1327		Part 94(1)(a) (name)
1328		Released - not in issue
1329	728	94(1)(a)
1330	729	94(1)(a)
1331		Released - not in issue
1332		Released - not in issue
1333		Released - not in issue
1334		Released - not in issue
1335		Released - not in issue
1336		Released - not in issue
1337		Released - not in issue
1338		Released - not in issue
1339		Released - not in issue
1340		Released - not in issue
1341		Released - not in issue
1342		Released - not in issue
1343		Released - not in issue
1344		Released - not in issue
1345		Released - not in issue
1346		Released - not in issue
1347		Released - not in issue
1348		Released - not in issue
1349		Released - not in issue
1350		Full CTPI (Category 3)
1351		Full CTPI (Category 3)
1352		Full CTPI (Category 3)
1353		Released - not in issue
1354		Released - not in issue
1355		Released - not in issue
1356		Released - not in issue
1357		Released - not in issue
1358		Released - not in issue
1359		Released - not in issue
1360		Part 94(1)(a) (name)

Page	310671 page no. (where relevant)	Decision
1361		Released - not in issue
1362		Released - not in issue
1363		Part 94(1)(a) (name)
1364		Released - not in issue
1365		Released - not in issue
1366		Released - not in issue
1367		Released - not in issue
1368		Released - not in issue
1369		Released - not in issue
1370		Released - not in issue
1371		Released - not in issue
1372		Released - not in issue
1373		Released - not in issue
1374		Released - not in issue
1375		Released - not in issue
1376		Released - not in issue
1377		Released - not in issue
1378		Released - not in issue
1379		Released - not in issue
1380		Released - not in issue
1381		Released - not in issue
1382		Released - not in issue
1383		Released - not in issue
1384		Released - not in issue
1385		Released - not in issue
1386		Released - not in issue
1387		Released - not in issue
1388		Released - not in issue
1389		Released - not in issue
1390		Released - not in issue
1391		Released - not in issue
1392		Released - not in issue
1393		Released - not in issue
1394		Released - not in issue
1395		Part CTPI (Category 1)
1396		Part CTPI (Category 3)
1397		Released - not in issue
1398		Released - not in issue
1399		Released - not in issue
1400		Released - not in issue
1401		Released - not in issue
1402		Released - not in issue
1403		Released - not in issue
1404		Released - not in issue
1405		Released - not in issue
1406		Released - not in issue
1407		Released - not in issue
1408		Released - not in issue
1409		Released - not in issue
1410		Released - not in issue
1411		Released - not in issue
1412		Released - not in issue
1413		Released - not in issue
1414		Released - not in issue

Page	310671 page no. (where relevant)	Decision
1415		Released - not in issue
1416		Released - not in issue
1417		Released - not in issue
1418		Released - not in issue
1419		Released - not in issue
1420		Released - not in issue
1421		Released - not in issue
1422		Released - not in issue
1423		Released - not in issue
1424		Released - not in issue
1425		Released - not in issue
1426		Released - not in issue
1427		Released - not in issue
1428		Released - not in issue
1429		Released - not in issue
1430		Released - not in issue
1431		Released - not in issue
1432		Released - not in issue
1433		Released - not in issue
1434		Released - not in issue
1435		Released - not in issue
1436		Released - not in issue
1437		Released - not in issue
1438		Released - not in issue
1439		Released - not in issue
1440		Released - not in issue
1441		Part 94(1)(a) (name)
1442		Released - not in issue
1443	728	94(1)(a)
1444	729	94(1)(a)
1445		Released - not in issue
1446		Released - not in issue
1447		Released - not in issue
1448		Released - not in issue
1449		Released - not in issue
1450		Released - not in issue
1451		Released - not in issue
1452		Released - not in issue
1453		Released - not in issue
1454		Released - not in issue
1455		Released - not in issue
1456		Released - not in issue
1457		Released - not in issue
1458		Released - not in issue
1459		Released - not in issue
1460		Released - not in issue
1461		Released - not in issue
1462		Released - not in issue
1463		Released - not in issue
1464		Released - not in issue
1465		Released - not in issue
1466		Released - not in issue
1467		Released - not in issue
1468		Released - not in issue

Page	310671 page no. (where relevant)	Decision
1469	618	94(1)(a)
1470		Released - not in issue
1471		Released - not in issue
1472		Released - not in issue
1473		Released - not in issue
1474		Released - not in issue
1475		Released - not in issue
1476		Released - not in issue
1477		Released - not in issue
1478		Released - not in issue
1479		Released - not in issue
1480		Released - not in issue
1481		Part exempt: LPP
1482		Released - not in issue
1483		Released - not in issue
1484		Released - not in issue
1485		Released - not in issue
1486		Released - not in issue
1487	670, 708	94(1)(a)
1488	670, 709	94(1)(a)
1489	671, 710	94(1)(a)
1490	671, 711	94(1)(a)
1491	672, 712	94(1)(a)
1492	672, 713	94(1)(a)
1493	673, 714	94(1)(a)
1494	673, 715	94(1)(a)
1495	674, 716	94(1)(a)
1496	674, 717	94(1)(a)
1497	675, 718	94(1)(a)
1498		Released - not in issue
1499		Full CTPI (Category 4)
1500		Full CTPI (Category 4)
1501		Full CTPI (Category 4)
1502		Full CTPI (Category 4)
1503		Full CTPI (Category 4)
1504		Full CTPI (Category 4)
1505		Full CTPI (Category 4)
1506		Full CTPI (Category 4)
1507		Released - not in issue
1508		Released - not in issue
1509		Released - not in issue
1510		Part CTPI (Category 1)
1511		Part CTPI (Category 1)
1512		Released - not in issue
1513		Part CTPI (Category 3)
1514		Part CTPI (Category 3)
1515		Released - not in issue
1516		Released - not in issue
1517		Released - not in issue
1518		Released - not in issue
1519		Released - not in issue
1520		Part CTPI (Category 2(c))
1521		Part CTPI (Category 2(c))
1522		Released - not in issue

Page	310671 page no. (where relevant)	Decision
1523		Part CTPI (Category 2(a))
1524		Segment 1: Part CTPI (Category 3)Balance: Part CTPI (Category 2(c))
1525		Released - not in issue
1526		Released - not in issue
1527		Released - not in issue
1528		Released - not in issue
1529		Full CTPI (Category 4)
1530		Full CTPI (Category 4)
1531		Full CTPI (Category 4)
1532		Full CTPI (Category 4)
1533		Full CTPI (Category 4)
1534		Full CTPI (Category 4)
1535		Full CTPI (Category 4)
1536		Full CTPI (Category 4)
1537		Full CTPI (Category 4)
1538		Full CTPI (Category 4)
1539		Part 94(1)(a) (name)
1540		Released - not in issue
1541	728	94(1)(a)
1542	729	94(1)(a)
1543		Part CTPI (Category 3)
1544		Full CTPI (Category 3)
1545		Full CTPI (Category 3)
1546		Part CTPI (Category 3)
1547		Part CTPI (Category 3)
1548		Full CTPI (Category 3)
1549		Released - not in issue
1550		Released - not in issue
1551		Released - not in issue
1552		Released - not in issue
1553		Released - not in issue
1554		Released - not in issue
1555		Released - not in issue
1556		Released - not in issue
1557		Released - not in issue
1558		Released - not in issue
1559		Released - not in issue
1560		Exempt: LPP
1561		Exempt: LPP
1562		Exempt: LPP
1563		Exempt: LPP
1564		Exempt: LPP
1565		Exempt: LPP
1566	592	94(1)(a)
1567	593	94(1)(a)
1568	594	94(1)(a)
1569	595	94(1)(a)
1570	596	94(1)(a)
1571	596	94(1)(a)
1572	597	94(1)(a)
1573		Exempt: LPP
1574		Exempt: LPP
1575		Exempt: LPP

Page	310671 page no. (where relevant)	Decision
1576		Exempt: LPP
1577		Exempt: LPP
1578		Exempt: LPP
1579		Exempt: LPP
1580		Exempt: LPP
1581		Released - not in issue
1582		Exempt: LPP
1583		Exempt: LPP
1584		Exempt: LPP
1585		Exempt: LPP
1586		Released - not in issue
1587		Released - not in issue
1588		Released - not in issue
1589		Released - not in issue
1590		Released - not in issue
1591		Released - not in issue
1592		Released - not in issue
1593		Released - not in issue
1594		Released - not in issue
1595		Released - not in issue
1596		Released - not in issue
1597		Released - not in issue
1598		Released - not in issue
1599		Released - not in issue
1600		Released - not in issue
1601	623	94(1)(a)
1602	624	94(1)(a)
1603	625	94(1)(a)
1604	626	94(1)(a)
1605	627	94(1)(a)
1606	592	94(1)(a)
1607	593	94(1)(a)
1608	594	94(1)(a)
1609	595	94(1)(a)
1610	596	94(1)(a)
1611	596	94(1)(a)
1612	597	94(1)(a)
1613		Exempt: LPP
1614		Exempt: LPP
1615		Exempt: LPP
1616		Exempt: LPP
1617		Exempt: LPP
1618		Released - not in issue
1619		Released - not in issue
1620		Released - not in issue
1621		Released - not in issue
1622		Released - not in issue
1623		Released - not in issue
1624		Exempt: LPP
1625		Exempt: LPP
1626		Exempt: LPP
1627		Exempt: LPP
1628		Exempt: LPP
1629		Exempt: LPP

Page	310671 page no. (where relevant)	Decision
1630	735	94(1)(a)
1631	736	94(1)(a)
1632	737	94(1)(a)
1633	738	94(1)(a)
1634	668	94(1)(a)
1635	669	94(1)(a)
1636	670, 708	94(1)(a)
1637	670, 709	94(1)(a)
1638	671, 710	94(1)(a)
1639	671, 711	94(1)(a)
1640	672, 712	94(1)(a)
1641	672, 713	94(1)(a)
1642	673, 714	94(1)(a)
1643	673, 715	94(1)(a)
1644	674, 716	94(1)(a)
1645	674, 717	94(1)(a)
1646	675, 718	94(1)(a)
1647	676	94(1)(a)
1648	691	94(1)(a)
1649	692	94(1)(a)
1650	693	94(1)(a)
1651	694	94(1)(a)
1652	695	94(1)(a)
1653	696	94(1)(a)
1654	697	94(1)(a)
1655	698	94(1)(a)
1656	699	94(1)(a)
1657	700	94(1)(a)
1658	701	94(1)(a)
1659	702	94(1)(a)
1660	703	94(1)(a)
1661	704	94(1)(a)
1662	705	94(1)(a)
1663	706	94(1)(a)
1664	707	94(1)(a)
1665		Released - not in issue
1666		Released - not in issue
1667		Released - not in issue
1668		Released - not in issue
1669		Released - not in issue
1670	739-742	Segment 1: LPP Segment 2: 94(1)(a)
1671	739-742	94(1)(a)
1672	739-742	94(1)(a)
1673	739-742	94(1)(a)
1674		Part CTPI (Category 3)
1675		Part CTPI (Category 3)
1676		Part CTPI (Category 3)
1677		Released - not in issue
1678		Full CTPI (Category 3)
1679		Full CTPI (Category 3)
1680		Full CTPI (Category 3)
1681		Full CTPI (Category 3)
1682		Full CTPI (Category 3)

Page	310671 page no. (where relevant)	Decision
1683		Full CTPI (Category 3)
1684		Full CTPI (Category 3)
1685		Part 94(1)(a) (name)
1686		Released - not in issue
1687	574, 663	94(1)(a)
1688	575, 663	94(1)(a)
1689	739-742	94(1)(a)
1690	739-742	94(1)(a)
1691	739-742	94(1)(a)
1692	664-666	94(1)(a)
1693	664-666	94(1)(a)
1694	664-666	94(1)(a)
1695		Part exempt: LPP
1696		Released - not in issue
1697		Released - not in issue
1698		Released - not in issue
1699		Released - not in issue
1700		Released - not in issue
1701		Released - not in issue
1702	664-666	94(1)(a)
1703	664-666	94(1)(a)
1704	664-666	94(1)(a)
1705		Part exempt: LPP
1706		Part exempt: LPP
1707		Part exempt: LPP
1708		Released - not in issue
1709		Released - not in issue
1710		Released - not in issue
1711		Released - not in issue
1712		Released - not in issue
1713		Released - not in issue
1714		Released - not in issue
1715		Part exempt: LPP
1716		Released - not in issue
1717		Released - not in issue
1718		Released - not in issue
1719		Released - not in issue
1720		Released - not in issue
1721		Part 94(1)(a) (name)
1722		Part CTPI (Category 3)
1723		Part 94(1)(a) (name)
1724	728	94(1)(a)
1725	729	94(1)(a)
1726		Released - not in issue
1727		Released - not in issue
1728		Exempt: LPP
1729		Exempt: LPP
1730		Exempt: LPP
1731		Exempt: LPP
1732		Exempt: LPP
1733		Exempt: LPP
1734		Exempt: LPP
1735		Exempt: LPP

Page	310671 page no. (where relevant)	Decision
1736		Exempt: LPP
1737		Exempt: LPP
1738		Exempt: LPP
1739		Exempt: LPP
1740		Exempt: LPP
1741		Exempt: LPP
1742		Exempt: LPP
1743		Exempt: LPP
1744		Exempt: LPP
1745		Exempt: LPP
1746		Exempt: LPP
1747		Exempt: LPP
1748		Exempt: LPP
1749		Exempt: LPP
1750		Exempt: LPP
1751		Exempt: LPP
1752		Exempt: LPP
1753		Exempt: LPP
1754		Exempt: LPP
1755		Exempt: LPP
1756		Exempt: LPP
1757		Exempt: LPP
1758		Exempt: LPP
1759		Exempt: LPP
1760		Exempt: LPP
1761		Exempt: LPP
1762		Exempt: LPP
1763		Exempt: LPP
1764		Exempt: LPP
1765		Exempt: LPP
1766		Exempt: LPP
1767		Exempt: LPP
1768		Exempt: LPP
1769		Exempt: LPP
1770		Exempt: LPP
1771		Exempt: LPP
1772		Exempt: LPP
1773		Exempt: LPP
1774		Exempt: LPP
1775		Exempt: LPP
1776		Exempt: LPP
1777		Exempt: LPP
1778		Exempt: LPP
1779		Exempt: LPP
1780		Exempt: LPP
1781		Exempt: LPP
1782		Exempt: LPP
1783		Exempt: LPP
1784		Exempt: LPP
1785		Exempt: LPP
1786		Exempt: LPP
1787		Exempt: LPP
1788		Exempt: LPP
1789		Exempt: LPP

Page	310671 page no. (where relevant)	Decision
1790		Segments 7-8: CTPI (Category 3) Balance: 94(1)(a) (name)
1791		Part CTPI (Category 3)
1792		Part CTPI (Category 3)
1793		Part CTPI (Category 3)
1794		Segments 7-8, 11-12: CTPI (Category 3) Balance: 94(1)(a) (name)
1795		Part CTPI (Category 3)
1796		Part CTPI (Category 3)
1797		Part CTPI (Category 3)
1798		Part CTPI (Category 3)
1799		Part CTPI (Category 3)
1800		Part CTPI (Category 3)
1801		Part CTPI (Category 3)
1802		Part CTPI (Category 3)
1803		Released - not in issue
1804		Released - not in issue
1805		Released - not in issue
1806		Part CTPI (Category 3)
1807		Part CTPI (Category 3)
1808		Full CTPI (Category 3)
1809		Part CTPI (Category 3)
1810		Part CTPI (Category 3)
1811		Full CTPI (Category 3)
1812		Part CTPI (Category 3)
1813		Full CTPI (Category 3)
1814		Full CTPI (Category 3)
1815		Part CTPI (Category 3)
1816		Full CTPI (Category 3)
1817		Full CTPI (Category 3)
1818		Part CTPI (Category 3)
1819		Part CTPI (Category 3)
1820		Full CTPI (Category 3)
1821		Full CTPI (Category 3)
1822		Full CTPI (Category 3)
1823		Released - not in issue
1824		Released - not in issue
1825		Released - not in issue
1826		Released - not in issue
1827		Released - not in issue
1828		Released - not in issue
1829		Released - not in issue
1830		Part CTPI (Category 3)
1831		Released - not in issue
1832	381	94(1)(a)
1833	382	94(1)(a)
1834	383	94(1)(a)
1835		Exempt: LPP
1836		Exempt: LPP
1837		Exempt: LPP
1838		Released - not in issue
1839		Segments 2-3, 7: CTPI (Category 3) Balance: 94(1)(a) (name)
1840		Part CTPI (Category 3)

Page	310671 page no. (where relevant)	Decision
1841	387	94(1)(a)
1842	389	94(1)(a)
1843		Released - not in issue
1844	389	94(1)(a)
1845		Exempt: LPP
1846		Exempt: LPP
1847		Exempt: LPP
1848		Exempt: LPP
1849	391	94(1)(a)
1850	392	94(1)(a)
1851	N/A	94(1)(a)
1852		Segments 1-2: CTPI (Category 3) Segments 3-4: LPP
1853		Segment 1: LPP Balance: CTPI (Category 3)
1854		Released - not in issue
1855		Part CTPI (Category 3)
1856		Part CTPI (Category 3)
1857		Part CTPI (Category 3)
1858		Released - not in issue
1859		Part CTPI (Category 3)
1860		Part CTPI (Category 3)
1861		Part CTPI (Category 3)
1862		Part CTPI (Category 3)
1863		Part CTPI (Category 3)
1864		Part 94(1)(a) (name)
1865	903, 904	Segments 1-3: CTPI (Category 3) Balance: 94(1)(a)
1866	904	94(1)(a)
1867	905	94(1)(a)
1868		Released - not in issue
1869		Part CTPI (Category 3)
1870		Part CTPI (Category 3)
1871		Part CTPI (Category 3)
1872		Part CTPI (Category 3)
1873		Part CTPI (Category 3)
1874		Released - not in issue
1875		Part exempt: LPP
1876		Exempt: LPP
1877		Exempt: LPP
1878		Exempt: LPP
1879		Exempt: LPP
1880		Released - not in issue
1881		Released - not in issue
1882		Part CTPI (Category 2(c))
1883		Part CTPI (Category 3)
1884		Segments 1-2: CTPI (Category 2(c)) Segment 3: CTPI (Category 3)
1885		Released - not in issue
1886		Part 94(1)(a) (name)
1887		Part 94(1)(a) (name)
1888		Released - not in issue
1889		Part CTPI (Category 3)
1890		Part CTPI (Category 3)

Page	310671 page no. (where relevant)	Decision
1891		Released - not in issue
1892		Part CTPI (Category 3)
1893		Part CTPI (Category 3)
1894		Part 94(1)(a) (name)
1895		Released - not in issue
1896		Part 94(1)(a) (name)
1897		Released - not in issue
1898	549, 559	94(1)(a)
1899	550, 560	94(1)(a)
1900	551, 561	94(1)(a)
1901	552, 562	94(1)(a)
1902	553, 563	94(1)(a)
1903	554, 564	94(1)(a)
1904	555, 565	94(1)(a)
1905	556, 566	94(1)(a)
1906	557, 567	94(1)(a)
1907	558, 568	94(1)(a)
1908	490	94(1)(a)
1909	491	94(1)(a)
1910	492	94(1)(a)
1911	493	94(1)(a)
1912	494	94(1)(a)
1913		Exempt: LPP
1914		Exempt: LPP
1915		Exempt: LPP
1916		Exempt: LPP
1917		Exempt: LPP
1918		Exempt: LPP
1919		Exempt: LPP
1920	549, 559	94(1)(a)
1921	550, 560	94(1)(a)
1922	551, 561	94(1)(a)
1923	552, 562	94(1)(a)
1924	553, 563	94(1)(a)
1925	554, 564	94(1)(a)
1926	555, 565	94(1)(a)
1927	556, 566	94(1)(a)
1928	557, 567	94(1)(a)
1929	558, 568	94(1)(a)
1930		Exempt: LPP
1931		Exempt: LPP
1932		Exempt: LPP
1933		Exempt: LPP
1934	448	94(1)(a)
1935	449	94(1)(a)
1936	450	94(1)(a)
1937	451	94(1)(a)
1938	452	94(1)(a)
1939	453	94(1)(a)
1940	454	94(1)(a)
1941	455	94(1)(a)
1942	456	94(1)(a)
1943	457	94(1)(a)
1944	458	94(1)(a)

Page	310671 page no. (where relevant)	Decision
1945	459	94(1)(a)
1946	460	94(1)(a)
1947	461	94(1)(a)
1948	462	94(1)(a)
1949	463	94(1)(a)
1950	464	94(1)(a)
1951	465	94(1)(a)
1952	466	94(1)(a)
1953	467	94(1)(a)
1954	468	94(1)(a)
1955	469	94(1)(a)
1956	501	94(1)(a)
1957	502	94(1)(a)
1958	503	94(1)(a)
1959	N/A	94(1)(a)
1960		Released - not in issue
1961		Released - not in issue
1962		Released - not in issue
1963		Released - not in issue
1964		Released - not in issue
1965		Released - not in issue
1966		Released - not in issue
1967		Released - not in issue
1968		Released - not in issue
1969		Released - not in issue
1970		Released - not in issue
1971		Released - not in issue
1972		Released - not in issue
1973		Released - not in issue
1974		Released - not in issue
1975	544	94(1)(a)
1976	545	94(1)(a)
1977	546	94(1)(a)
1978	504	94(1)(a)
1979	505	94(1)(a)
1980	506	94(1)(a)
1981	507	94(1)(a)
1982	508	94(1)(a)
1983	509	94(1)(a)
1984	510	94(1)(a)
1985	511	94(1)(a)
1986	512	94(1)(a)
1987	513	94(1)(a)
1988	514	94(1)(a)
1989	515	94(1)(a)
1990	516	94(1)(a)
1991	517	94(1)(a)
1992	518	94(1)(a)
1993	519	94(1)(a)
1994	520	94(1)(a)
1995	521	94(1)(a)
1996	522	94(1)(a)
1997	523	94(1)(a)
1998	524	94(1)(a)

Page	310671 page no. (where relevant)	Decision
1999	525	94(1)(a)
2000	526	94(1)(a)
2001	527	94(1)(a)
2002	528	94(1)(a)
2003		Part CTPI (Category 1)
2004		Part CTPI (Category 1)
2005		Part CTPI (Category 1)
2006		Part CTPI (Category 1)
2007		Part CTPI (Category 1)
2008		Part CTPI (Category 1)
2009		Part CTPI (Category 1)
2010		Part CTPI (Category 1)
2011		Part CTPI (Category 1)
2012		Released - not in issue
2013		Released - not in issue
2014		Released - not in issue
2015		Exempt: LPP
2016		Exempt: LPP
2017	549, 559	94(1)(a)
2018	550, 560	94(1)(a)
2019	551, 561, 580	94(1)(a)
2020	552, 562, 581	94(1)(a)
2021	553, 563, 582	94(1)(a)
2022	554, 564, 583	94(1)(a)
2023	555, 565, 584	94(1)(a)
2024	556, 566, 585	94(1)(a)
2025	557, 567, 586	94(1)(a)
2026	558, 568, 587	94(1)(a)
2027		Released - not in issue
2028		Part CTPI (Category 3)
2029		Exempt: LPP
2030		Exempt: LPP
2031		Exempt: LPP
2032		Exempt: LPP
2033	551, 561, 580	94(1)(a)
2034	552, 562, 581	94(1)(a)
2035	553, 563, 582	94(1)(a)
2036	554, 564, 583	94(1)(a)
2037	555, 565, 584	94(1)(a)
2038	556, 566, 585	94(1)(a)
2039	557, 567, 586	94(1)(a)
2040	558, 568, 587	94(1)(a)
2041		Part CTPI (Category 3)
2042		Released - not in issue
2043		Outside Scope
2044		Outside Scope
2045		Outside Scope
2046		Outside Scope
2047		Outside Scope
2048		Outside Scope
2049		Outside Scope
2050		Outside Scope
2051		Outside Scope
2052	599	94(1)(a)

Page	310671 page no. (where relevant)	Decision
2053	600	94(1)(a)
2054	601	94(1)(a)
2055	602	94(1)(a)
2056	603	94(1)(a)
2057	604	94(1)(a)
2058	605	94(1)(a)
2059		Part 94(1)(a) (name)
2060		Released - not in issue
2061		Part 94(1)(a) (name)
2062		Released - not in issue
2063		Part CTPI (Category 3)
2064		Part exempt: LPP
2065		Part exempt: LPP
2066		Released - not in issue
2067		Exempt: LPP
2068		Part exempt: LPP
2069		Released - not in issue
2070		Released - not in issue
2071		Part exempt: LPP
2072		Part exempt: LPP
2073		Released - not in issue
2074		Exempt: LPP
2075		Part exempt: LPP
2076		Released - not in issue
2077		Part exempt: LPP
2078		Released - not in issue
2079		Released - not in issue
2080		Released - not in issue
2081		Released - not in issue
2082	140	94(1)(a)
2083	141	94(1)(a)
2084		Exempt: LPP
2085		Exempt: LPP
2086		Exempt: LPP
2087	142	94(1)(a)
2088	143	94(1)(a)
2089	144	94(1)(a)
2090	145	94(1)(a)
2091	146	94(1)(a)
2092	147	94(1)(a)
2093	N/A	94(1)(a)
2094	148	94(1)(a)
2095	149	94(1)(a)
2096	150	94(1)(a)
2097	151	94(1)(a)
2098	152	94(1)(a)
2099	153	94(1)(a)
2100	154	94(1)(a)
2101	171	94(1)(a)
2102	172	94(1)(a)
2103	173	94(1)(a)
2104	174	94(1)(a)
2105	175	94(1)(a)
2106	176	94(1)(a)

Page	310671 page no. (where relevant)	Decision
2107	162	94(1)(a)
2108	163	94(1)(a)
2109	164	94(1)(a)
2110	165	94(1)(a)
2111	166	94(1)(a)
2112	167	94(1)(a)
2113	168	94(1)(a)
2114	160	94(1)(a)
2115	157	94(1)(a)
2116	158	94(1)(a)
2117	159	94(1)(a)
2118	83, 256	94(1)(a)
2119	157	94(1)(a)
2120	158	94(1)(a)
2121	159	94(1)(a)
2122	83, 256	94(1)(a)
2123	81, 155	94(1)(a)
2124	82, 156	94(1)(a)
2125	N/A	94(1)(a)
2126	83, 256	94(1)(a)
2127		Exempt: LPP
2128		Exempt: LPP
2129		Exempt: LPP
2130		Exempt: LPP
2131		Exempt: LPP
2132		Exempt: LPP
2133	265	94(1)(a)
2134	266	94(1)(a)
2135	267	94(1)(a)
2136	268	94(1)(a)
2137	269	94(1)(a)
2138	270	94(1)(a)
2139		Exempt: LPP
2140		Exempt: LPP
2141		Exempt: LPP
2142		Exempt: LPP
2143		Exempt: LPP
2144		Exempt: LPP
2145	83, 256	94(1)(a)
2146		Full CTPI (Category 3)
2147		Full CTPI (Category 3)
2148		Full CTPI (Category 3)
2149	257	94(1)(a)
2150	258	94(1)(a)
2151	259	94(1)(a)
2152	91, 260	94(1)(a)
2153	92, 261	94(1)(a)
2154	93, 262	94(1)(a)
2155	94, 263	94(1)(a)
2156	95, 264	94(1)(a)
2157		Part 94(1)(a) (names)
2158		Segments 1, 5, 6-7: 94(1)(a) (name) Balance: CTPI (Category 3)

Page	310671 page no. (where relevant)	Decision
2159		Segments 2-3: CTPI (Category 3) Balance: 94(1)(a) (name)
2160		Part CTPI (Category 3)
2161		Exempt: LPP
2162		Exempt: LPP
2163		Exempt: LPP
2164		Exempt: LPP
2165		Exempt: LPP
2166		Exempt: LPP
2167		Exempt: LPP
2168		Exempt: LPP
2169		Full CTPI (Category 3)
2170		Full CTPI (Category 3)
2171		Part 94(1)(a) (name)
2172		Segments 1, 5, 6-7: 94(1)(a) (name) Balance: CTPI (Category 3)
2173		Segments 2-3: CTPI (Category 3) Balance: 94(1)(a) (name)
2174		Segment 1: 94(1)(a) (name) Balance: CTPI (Category 3)
2175		Released - not in issue
2176		Part 94(1)(a) (name)
2177		Segment 1: 94(1)(a) (name) Balance: CTPI (Category 3)
2178		Segments 1-2: 94(1)(a) (name) Balance: CTPI (Category 3)
2179		Released - not in issue
2180		Part exempt: LPP
2181		Part CTPI (Category 3)
2182		Released - not in issue
2183		Part exempt: LPP
2184		Part CTPI (Category 3)
2185		Released - not in issue
2186		Part CTPI (Category 3)
2187		Released - not in issue
2188		Released - not in issue
2189		Part CTPI (Category 3)
2190		Released - not in issue
2191		Released - not in issue
2192		Part CTPI (Category 3)
2193		Released - not in issue
2194	303	94(1)(a)
2195	304	94(1)(a)
2196	305	94(1)(a)
2197	306	94(1)(a)
2198	307	94(1)(a)
2199	308	94(1)(a)
2200		Released - not in issue
2201		Released - not in issue
2202		Released - not in issue
2203		Part 94(1)(a) (name)
2204		Part CTPI (Category 2(a))
2205		Exempt: LPP
2206		Exempt: LPP

Page	310671 page no. (where relevant)	Decision
2207		Exempt: LPP
2208		Exempt: LPP
2209		Exempt: LPP
2210		Segments 1-4: 94(1)(a) (name) Balance: CTPI (Category 3)
2211		Segments 2-3: CTPI (Category 3) Balance: 94(1)(a) (name)
2212		Part CTPI (Category 3)
2213		Part 94(1)(a)
2214		Segment 1: 94(1)(a) (name) Segment 2: CTPI (Category 2(a))
2215	319	94(1)(a)
2216	320	94(1)(a)
2217	321	94(1)(a)
2218	n/a	94(1)(a)
2219		Exempt: LPP
2220		Exempt: LPP
2221		Exempt: LPP
2222		Exempt: LPP
2223	322	94(1)(a)
2224	323	94(1)(a)
2225	324	94(1)(a)
2226	325	94(1)(a)
2227	326	94(1)(a)
2228	327	94(1)(a)
2229		Exempt: LPP
2230		Exempt: LPP
2231	340	94(1)(a)
2232	341	94(1)(a)
2233	342	94(1)(a)
2234	343	94(1)(a)
2235	344	94(1)(a)
2236	345	94(1)(a)
2237	346	94(1)(a)
2238	347	94(1)(a)
2239	348	94(1)(a)
2240	349	94(1)(a)
2241	N/A	94(1)(a)
2242	499/500; 446/7	94(1)(a)
2243	499/500; 446/7	94(1)(a)
2244	350	94(1)(a)
2245	351	94(1)(a)
2246	352	94(1)(a)
2247	353	94(1)(a)
2248	354	94(1)(a)
2249	355	94(1)(a)
2250	356	94(1)(a)
2251	357	94(1)(a)
2252	358	94(1)(a)
2253	359	94(1)(a)
2254		Released - not in issue
2255		Part exempt: LPP
2256		Exempt: LPP
2257		Exempt: LPP

Page	310671 page no. (where relevant)	Decision
2258	360	94(1)(a)
2259	361	94(1)(a)
2260	362	94(1)(a)
2261	363	94(1)(a)
2262		Part exempt: LPP
2263		Exempt: LPP
2264		Exempt: LPP
2265		Released - not in issue
2266		Released - not in issue
2267		Released - not in issue
2268		Released - not in issue
2269		Released - not in issue
2270		Part CTPI (Category 3)
2271		Part CTPI (Category 3)
2272		Exempt: LPP
2273		Exempt: LPP
2274		Exempt: LPP
2275		Segment 1: 94(1)(a) (name) Segment 2: CTPI (Category 2(a))
2276		Segments 1-2, 5,8: 94(1)(a) (names) Balance CTPI: Category 3
2277		Segments 1-2: 94(1)(a) (name) Balance: CTPI (Category 3)
2278		Released - not in issue
2279		Released - not in issue
2280		Part exempt: LPP
2281		Exempt: LPP
2282		Exempt: LPP
2283		Segment 1: 94(1)(a) (name) Segment 2: CTPI (Category 3)
2284		Exempt: LPP
2285	549, 559	94(1)(a)
2286	550, 560	94(1)(a)
2287		Exempt: LPP
2288		Exempt: LPP
2289	551, 561, 580	94(1)(a)
2290	552, 562, 581	94(1)(a)
2291	553, 563, 582	94(1)(a)
2292	554, 564, 583	94(1)(a)
2293	555, 565, 584	94(1)(a)
2294	556, 566, 585	94(1)(a)
2295	557, 567, 586	94(1)(a)
2296	558, 568, 587	94(1)(a)
2297		Released - not in issue
2298		Part exempt: LPP
2299		Released - not in issue
2300		Released - not in issue
2301		Released - not in issue
2302		Released - not in issue
2303		Released - not in issue
2304		Released - not in issue
2305		Released - not in issue
2306		Released - not in issue
2307		Released - not in issue

Page	310671 page no. (where relevant)	Decision
2308		Released - not in issue
2309		Released - not in issue
2310		Released - not in issue
2311		Released - not in issue
2312		Released - not in issue
2313		Released - not in issue
2314	687-688	94(1)(a)
2315	688-689	94(1)(a)
2316	690	94(1)(a)
2317	695	94(1)(a)
2318	696	94(1)(a)
2319	697	94(1)(a)
2320	698	94(1)(a)
2321	699	94(1)(a)
2322	700	94(1)(a)
2323	701	94(1)(a)
2324	702	94(1)(a)
2325	703	94(1)(a)
2326	704	94(1)(a)
2327	705	94(1)(a)
2328	706	94(1)(a)
2329	707	94(1)(a)
2330	691	94(1)(a)
2331	692	94(1)(a)
2332	693	94(1)(a)
2333	694	94(1)(a)
2334		Segments 7-8: CTPI (Category 3) Balance: 94(1)(a) (name)
2335		Part CTPI (Category 3)
2336		Part CTPI (Category 3)
2337		Part CTPI (Category 3)
2338		Released - not in issue
2339		Full CTPI (Category 3)
2340		Released - not in issue
2341		Segments 1-2: CTPI (Category 3) Segment 3: LPP
2342		Part exempt: LPP
2343		Released - not in issue
2344		Released - not in issue
2345		Released - not in issue
2346		Released - not in issue
2347		Part CTPI (Category 2(a))
2348		Released - not in issue
2349	389	94(1)(a)
2350		Part 94(1)(a) (name)
2351		Released - not in issue
2352	110, 488	94(1)(a)
2353		Released - not in issue
2354		Part CTPI (Category 3)
2355		Released - not in issue
2356		Released - not in issue
2357		Released - not in issue
2358		Part CTPI (Category 3)
2359	108, 486	94(1)(a)

Page	310671 page no. (where relevant)	Decision
2360	109, 487	94(1)(a)
2361		Part 94(1)(a) (name)
2362		Released - not in issue
2363		Released - not in issue
2364		Released - not in issue
2365		Released - not in issue
2366		Released - not in issue
2367		Released - not in issue
2368		Released - not in issue
2369		Released - not in issue
2370		Released - not in issue
2371		Part CTPI (Category 2(c))
2372		Part 94(1)(a) (name)
2373		Segment 1: 94(1)(a) Balance: CTPI (Category 2(b))
2374		Segment 1: 94(1)(a) Balance: CTPI (Category 2(b))
2375		Segment 1: 94(1)(a) Balance: CTPI (Category 2(b))
2376		Released - not in issue
2377		Segment 1: 94(1)(a) Balance: CTPI (Category 2(b))
2378		Segment 1: 94(1)(a) Balance: CTPI (Category 2(b))
2379		Segment 1: 94(1)(a) Balance: CTPI (Category 2(b))
2380		Segment 1: 94(1)(a) Balance: CTPI (Category 2(b))
2381		Released - not in issue
2382		Released - not in issue
2383		Released - not in issue
2384		Released - not in issue
2385		Released - not in issue
2386		Released - not in issue
2387		Part CTPI (Category 2(d))
2388		Part CTPI (Category 2(d))
2389		Released - not in issue
2390		Released - not in issue
2391		Released - not in issue
2392		Part CTPI (Category 3)
2393		Released - not in issue
2394		Released - not in issue
2395		Part CTPI (Category 2(a))
2396		Part CTPI (Category 2(b))
2397		Part CTPI (Category 2(b))
2398		Released - not in issue
2399		Released - not in issue
2400		Released - not in issue
2401		Released - not in issue
2402		Released - not in issue
2403		Part CTPI (Category 2(a))
2404		Released - not in issue
2405		Released - not in issue
2406		Released - not in issue

Page	310671 page no. (where relevant)	Decision
2407		Part CTPI (Category 2(a))
2408		Released - not in issue
2409		Released - not in issue
2410		Released - not in issue
2411		Released - not in issue
2412		Released - not in issue
2413		Released - not in issue
2414		Released - not in issue
2415		Segment 1: CTPI (Category 2(d)) Segment 2: CTPI (Category 2(c))
2416		Released - not in issue
2417		Released - not in issue
2418		Released - not in issue
2419		Released - not in issue
2420		Segment 1: CTPI (Category 2(c)) Segment 2: CTPI (Category 2(d))
2421		Part CTPI (Category 2(c))
2422		Released - not in issue
2423		Released - not in issue
2424		Released - not in issue
2425		Released - not in issue
2426		Released - not in issue
2427		Part CTPI (Category 2(d))
2428	389	94(1)(a)
2429		Released - not in issue
2430		Released - not in issue
2431		Released - not in issue
2432		Released - not in issue
2433		Released - not in issue
2434	229; 1233; 1280	94(1)(a)
2435	230; 1234; 1281	94(1)(a)
2436	231; 1235; 1282	94(1)(a)
2437	232; 1236; 1283	94(1)(a)
2438	233; 1284	94(1)(a)
2439	234; 1285	94(1)(a)
2440	235; 1237; 1286	94(1)(a)
2441	1238; 1287	94(1)(a)
2442	1239; 1288	94(1)(a)
2443	1240; 1289	94(1)(a)
2444		Released - not in issue