



## Decision and Reasons for Decision

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Citation:	<i>Cape York Land Council and Department of Natural Resources, Mines and Energy [2020] QICmr 60 (16 October 2020)</i>
Application Number:	314921 and 315083
Applicant:	Cape York Land Council ABN 22 965 382 705
Respondent:	Department of Natural Resources, Mines and Energy
Decision Date:	16 October 2020
Catchwords:	ADMINISTRATIVE LAW - RIGHT TO INFORMATION - REFUSAL OF ACCESS - DOCUMENTS NONEXISTENT - documents to evidence changes to dedicated purpose of land - applicant considers records of the changes should be held in automated titles system - agency submits changes were made administratively by internal project - whether there are reasonable grounds to be satisfied that documents do not exist - whether access may be refused on the basis that the documents are nonexistent under sections 47(3)(e) and 52(1)(a) of the <i>Right to Information Act 2009</i> (Qld)

## REASONS FOR DECISION

### Summary

1. Cape York Land Council (**CYLC**) made two applications<sup>1</sup> to the Department of Natural Resources, Mines and Energy (**Department**) under the *Right to Information Act 2009* (Qld) (**RTI Act**) seeking access to documents relating to two parcels of land.<sup>2</sup>
2. The Department released 32 relevant pages subject to the redaction of a small amount of personal information of other individuals.<sup>3</sup> The located documents included records of land dealings, titles instruments, correspondence between relevant Queensland government agencies and various maps.
3. CYLC applied for external review of both decisions, submitting that further documents should have been located.<sup>4</sup> In summary, the applicant submits that changes to the Automated Titles System (**ATS**), resulting in the purpose of both Lots 1 and 3 being changed from '*Department and Official*' to '*Resource Reserve*', should be evidenced by supporting titles instruments or other documents. CYLC also relies on provisions of the

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<sup>1</sup> Access applications dated 13 August 2019 and 22 October 2019.

<sup>2</sup> Lot 3 Crown Plan JD8 (**Lot 3**) and Lot 1 Crown Plan SO806056 (**Lot 1**).

<sup>3</sup> Decisions dated 18 September and 12 December 2019.

<sup>4</sup> CYLC did not contest the redactions of personal information and therefore, that information is not in issue in these reviews.

*Land Act 1994* (Qld) (**Land Act**) relating to the keeping of a register to record such changes.

4. On external review, the Department conducted further searches and inquiries with State Lands Asset Management (**SLAM**) and the Titles Registry. The Department located and released database extracts<sup>5</sup> pertaining to title references for Lot 3. To explain the nonexistence of further documents, the Department referred to an *'internal Departmental project'* that was undertaken *'to ensure the completeness and correctness of the register'*.<sup>6</sup>
5. For the reasons set out below, I vary the Department's decisions and find that access to any further documents may be refused under section 47(3)(e) of the RTI Act because they do not exist.

## Background

6. Lots 1 and 3 in the Jardine River and Heathlands areas, at the tip of the Cape York peninsula, have been the subject of national park tenure negotiations between the Queensland Government and Traditional Owners for a number of years. In late 2019, after inconsistencies in the ATS were identified for these parcels of land, it was announced that a review would be conducted to confirm the validity of declarations applicable to national park areas.<sup>7</sup>
7. Significant procedural steps taken during the external review are set out in the Appendix.

## Reviewable decisions

8. In review 314921, the decision under review is the Department's decision dated 18 September 2019.
9. In review 315083, the decision under review is the Department's decision dated 12 December 2019.

## Evidence considered

10. Evidence, submissions, legislation and other material I have considered in reaching this decision are disclosed in these reasons (including in footnotes and the Appendix).
11. In making this decision, I have had regard to the *Human Rights Act 2019* (Qld) (**HR Act**), including section 58(1) of the HR Act which requires a public entity, such as the Information Commissioner, to make decisions that are compatible with human rights.<sup>8</sup> Noting the recent consideration of section 58(1) of the HR Act in *Waratah Coal Pty Ltd v Youth Verdict Ltd & Ors*<sup>9</sup>, I have considered engaged human rights, and acted compatibly with those rights, in accordance with section 58(1) of the HR Act.<sup>10</sup>

<sup>5</sup> Two pages. Extracted from the Titles Automation area which is responsible for the ATS, within the Titles Registry.

<sup>6</sup> Described as the Land Register/USL Register project (**Project**): submissions to OIC dated 3 June 2020.

<sup>7</sup> Michael McKenna, 'Indigenous Land Transfer in Doubt for 160,000ha in Queensland', *The Australian* (online, 28 December 2019); Michael McKenna, 'ALP Admits Blunder Over Cape York Land Title', *The Australian* (online, 7 December 2019). OIC was not provided with any information as to the current status of the government review, nor the status of the tenure negotiations.

<sup>8</sup> Ordinarily, the Information Commissioner would have regard to the human right to seek and receive information in section 21 of the HR Act. However, section 11(2) of the HR Act provides that only individuals have human rights and the applicant here is a corporation.

<sup>9</sup> [2020] QLC 33 at [90], Kingham J found that there need be no mover to raise human rights issues because section 58(1) of the HR Act requires the relevant public entity to properly consider engaged human rights and to not act or make a decision that is incompatible with human rights.

<sup>10</sup> Including the right to seek and receive information in section 21 of the HR Act and section 28 of the HR Act which provides that Aboriginal peoples have distinct cultural rights, particularly in relation to land.

## Issues for determination

12. In both reviews, the issues for determination are:<sup>11</sup>

- whether the Department has taken reasonable steps to locate all documents requested in the applications; and
- whether access can be refused to any further information on the basis that it does not exist or cannot be located.

## Scope

13. During processing, the scope of both applications was amended following negotiations between the Department and CYLC. The amended scope of each application is set out below:

1. *All title instruments (or other similar documents) recorded on the Automated Title System in regard to Lot 3 Crown Plan JD8.*
2. *All documents that record the Title Reference of Lot 3 Crown Plan JD8.*

*Time period: 1 January 2000 to 1 January 2008.*<sup>12</sup>

and

*All documents recorded in State Land Asset Management in regard to Lot 1 Crown Plan SO806056.*

*Time period: 1 January 2000 to 1 January 2008.*<sup>13</sup>

14. As stated above, the applicant is seeking documents or titles instruments to support the change in purpose of Lots 1 and 3 from *'Department and Official'* to *'Resource Reserve'*. In relation to Lot 1, the applicant also considers equivalent database extracts to those located for Lot 3 should have been located. The applicant also considers that documents from the Project that relate to Lots 1 and 3 fall within the scope of the applications and should have been located.
15. When interpreting scope, the Information Commissioner has previously found that the terms of an application will set the parameters for an agency's search efforts and that an applicant cannot unilaterally expand the terms of an application.<sup>14</sup> Although the scope of an access application should not be interpreted legalistically or narrowly, it is important that agencies be able to restrict their searches for documents with reference to an access application's scope.<sup>15</sup>
16. Based on the scope of the Lot 1 application as set out in paragraph 13 above, I consider that database extracts (equivalent to those located in relation to Lot 3) are not within scope because the Lot 1 application was limited to SLAM documents, whereas the database extracts were generated by the Titles Registry.<sup>16</sup>
17. With respect to the Project documents, I do not consider it would be reasonable to interpret either application as seeking documents relating to an internal agency process

<sup>11</sup> Under section 47(3)(e) and 52(1) of the RTI Act.

<sup>12</sup> This scope is the subject of external review 314921.

<sup>13</sup> This scope is the subject of external review 315083.

<sup>14</sup> See *Bade and Gympie Regional Council* (Unreported, Queensland Information Commissioner, 14 February 2012); *Robbins and Brisbane North Regional Health Authority* (1994) 2 QAR 30; and *Cannon and Australian Quality Egg Farms Limited* (1994) 1 QAR 491 at [8].

<sup>15</sup> See *Fennelly and Redland City Council* (Unreported, Queensland Information Commissioner, 21 August 2012) at [21].

<sup>16</sup> The Department comprises two separate business units, Titles Registry and SLAM.

that was implemented to address inconsistencies in the ATS. Further, based on the scope of the applications, I do not consider it would have been reasonable to expect the Department to direct its searches to documents about the Project, when the applications were expressed as seeking titles instruments (or similar) or SLAM documents regarding specified parcels of land, with no reference to internal agency project documents.

18. In view of the above, I find that database extracts do not fall within the scope of the Lot 1 application and Project documents do not fall within the scope of either application.<sup>17</sup>
19. Therefore, in considering the issues for determination, I have made my findings based on the scope of the applications set out at paragraph 13 above.

### Relevant law

20. The RTI Act affords a person a right to be given access to documents of an agency,<sup>18</sup> however, this right of access is subject to limitations, including the grounds on which access to information may be refused.<sup>19</sup> Access to a document may be refused if it is nonexistent.<sup>20</sup> A document will be nonexistent if there are reasonable grounds to be satisfied the document does not exist.<sup>21</sup> To be satisfied that documents are nonexistent, a decision maker must rely on their particular knowledge and experience and have regard to a number of key factors.<sup>22</sup>
21. By considering those key factors, an agency may ascertain that a particular document was not created because, for example, the agency's processes do not involve creating that specific document. In such instances, it is not necessary for the agency to search for the document. Rather, it is sufficient that the relevant circumstances to account for the nonexistent document are adequately explained by the agency.
22. An agency may however, also rely on searches to satisfy itself that a document does not exist. In those cases, reasonable steps must be taken to locate the documents.<sup>23</sup> Such steps may include inquiries and searches of all relevant locations identified after consideration of the key factors.<sup>24</sup>
23. Generally, on external review, the agency that made the decision under review has the onus of establishing that the decision was justified or that the Information Commissioner should give a decision adverse to the applicant.<sup>25</sup> However, where the issue of missing documents is raised, the applicant bears a practical onus to establish reasonable grounds to believe that the agency has not discharged its obligation to locate all relevant documents.<sup>26</sup>

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<sup>17</sup> It would be open for CYLC to make fresh applications for such information.

<sup>18</sup> Section 23(1)(a) of the RTI Act.

<sup>19</sup> Section 47(3) of the RTI Act.

<sup>20</sup> Sections 47(3)(e) and 52(1)(a) of the RTI Act.

<sup>21</sup> Section 52(1)(a) of the RTI Act.

<sup>22</sup> *Pryor and Logan City Council* (Unreported, Queensland Information Commissioner, 8 July 2010) (*Pryor*) at [19] which adopted the Information Commissioner's comments in *PDE and the University of Queensland* (Unreported, Queensland Information Commissioner, 9 February 2009). The key factors include: the administrative arrangements of government; the agency structure; the agency's functions and responsibilities; the agency's practices and procedures and other factors including the nature and age of the requested document/s and the nature of the government activity to which the request relates.

<sup>23</sup> As set out in *PDE* at [49]. See also section 130(2) of the RTI Act.

<sup>24</sup> At footnote 22.

<sup>25</sup> Section 87(1) of the RTI Act.

<sup>26</sup> See *Mewburn and Department of Local Government, Community Recovery and Resilience* [2014] QICmr 43 (31 October 2014) at [13].

## CYLC's submissions

24. CYLC submits that documents do exist and are locatable because the change to the ATS *'could not have been made without a document, and the chief executive under the Land Act 1994 has an obligation to keep a register and record any changes, including corrections, to that register'*.<sup>27</sup> CYLC submits<sup>28</sup> that the documents disclosed by the Department reveal the following:
- in 2000 SLAM recorded Lot 1 as a *'Reserve for Department and Official (Natural Resources) Purposes'*
  - prior to 1 June 2007, the purpose for Lot 3 was described as *'Departmental and Official'*; and
  - on 28 February 2007 and 27 August 2007 section 29(1)(d) of the *Nature Conservation Act 1992* (Qld) (**Nature Conservation Act**) provided that Resources Reserves could be dedicated by regulation under that Act and on those dates, new title references were created for Lots 1 and 3 and the purpose recorded as *'Resource Reserve'*.
25. CYLC argues that, in order for the purpose of Lots 1 and 3 to change from Departmental and Official Purposes Reserves (**D&O**) to Resources Reserves, the D&O reserve dedication would first have to be revoked.<sup>29</sup> However, CYLC emphasises that the D&O dedications were not revoked *'but the title records were changed as if they had been'*.<sup>30</sup>
26. CYLC also relies on sections of the Land Act which, at the relevant times, required a register of reserves to be kept and records of reserve dedication or revocation to be kept.<sup>31</sup> CYLC submits that documents must exist to evidence the change in purpose of Lots 1 and 3 because the relevant legislation required such information to be kept in the register.
27. With respect to the Project, CYLC considers that:<sup>32</sup>
- Particulars of any changes made to the register through an internal project would have to be recorded on the register as required by ... the Land Act 1994.*
- ... If the change arising from the internal project was undertaken to ensure the completeness and correctness of the register, at the relevant times section 291(3) of the Land Act 1994 required that the chief executive record in the register the state of the register before the correction and the time, day and circumstances of the correction.*
28. To support this submission, CYLC points out that one of the released *'Departmental Dealing'* documents pertaining to Lot 3 shows that the register was corrected in this way. CYLC also argues that changes to the purpose of Lots 1 and 3 could not solely be made by legislative instrument<sup>33</sup> without a supporting document.<sup>34</sup>

<sup>27</sup> Submission to OIC dated 10 July 2020.

<sup>28</sup> Submission to OIC dated 10 July 2020.

<sup>29</sup> In accordance with section 33 of the Land Act, at the relevant times.

<sup>30</sup> Submissions to OIC dated 10 July 2020.

<sup>31</sup> At the time, section 279 of the Land Act.

<sup>32</sup> Submissions to OIC dated 10 July 2020.

<sup>33</sup> *Nature Conservation (Protected Areas) Regulation 1994* (Qld) and the *Nature Conservation (Administration) Regulation 2006* (Qld).

<sup>34</sup> CYLC provided examples of other circumstances where change by way of legislative instrument was accompanied by a separate record/dealing document in the ATS.

29. CYLC also provided copies and extracts from of letters<sup>35</sup> and Questions on Notice (QON)<sup>36</sup> relating to the title inconsistency issues pertaining to Lots 1 and 3. Relevantly, those documents state as follows:

*... the resources reserves are not valid and ... the lands in question are in fact Departmental and Official Purposes Reserves (D&O)...<sup>37</sup>*

and

*...it has been **confirmed that a gazettal notice cannot be found** and thus the D&O reserves were not appropriately revoked, it is confirmed that the D&O reserves remain the valid tenure.*

...

*...the D&O reserves tenure is no impediment to the dealing. Relatively simple steps need to be undertaken under the Land Act and the Aboriginal Land Act 1991 to prepare the D&O reserves for transfer to Aboriginal ownership.<sup>38</sup>*

and

*... following extensive archival searches, it has **not been possible to find evidence of the cancellation of the Departmental and Official Purposes Reserves** under the Land Act 1994 prior to their dedication as resources reserves under the Nature Conservation Act 1992. Therefore, it is arguable that these dedications were beyond power and the tenure remains that of Departmental and Official Purposes Reserves under the Land Act 1994.*

...

*The **administrative error** at the time of the dedication of the resources reserves under the Nature Conservation Act 1992 does not preclude the dealing proceeding...<sup>39</sup>*

and

*(a) Records for the Heathlands and Jardine River resource reserves in the non-freehold land registry were **created on the instructions of the former Environmental Protection Agency, in 2007.***

*(b) Should there be any requirement to amend the records of any resource reserves in the non-freehold registry, the Department of Natural Resources, Mines and Energy will act on instructions from the Department of Environment and Science.<sup>40</sup>*

[emphasis added]

## Department's searches and submissions

30. The Department provided OIC with evidence that, in processing the applications, it conducted searches and enquiries of the Titles Registry and SLAM.<sup>41</sup> The Department

<sup>35</sup> Addressed to the Balkanu Cape York Development Corporation (**Balkanu**).

<sup>36</sup> No. 1907, dated 27 November 2019, asked of the then Minister for Natural Resources, Mines and Energy (Hon. Dr A Lynham).

<sup>37</sup> Letter from the Department of Aboriginal and Torres Strait Islander Partnerships (**DATSIP**) dated 16 May 2019.

<sup>38</sup> Letter from DATSIP dated 16 May 2019.

<sup>39</sup> Letter from Hon Leanne Enoch, Minister for Environment and the Great Barrier Reef, Minister for Science and Minister for the Arts, dated 9 May 2019.

<sup>40</sup> QON dated 27 November 2019.

<sup>41</sup> Submissions to OIC dated 14 January 2020, 3 June 2020 and 12 August 2020 and decisions dated 18 September 2019 and 12 December 2019.

also provided OIC with search records and certifications from officers employed in the relevant business units who conducted searches for the requested documents.<sup>42</sup>

31. During processing, Titles Registry expressed the view that, in relation to Lot 3:<sup>43</sup>

*This change may have been done by SLAM using their program eLVAS which can create a new title in ATS -this could be why there is no record of any document lodged in ATS to make the change.*

However, when the Department put this to SLAM, it advised that 'eLVAS does not have the capacity to create new titles and cannot create new reserve titles or unallocated State land titles ... SLAM don't have any other records'.<sup>44</sup>

32. As indicated earlier in these reasons, after conducting searches, the Department put forward submissions about the Project to explain the nonexistence of further documents in relation to both applications, as follows:<sup>45</sup>

*Our business unit considers that the information does not exist because it is not recorded on the relevant titles for the land recorded in ATS. It would appear that the changes were effected under an internal Departmental project to ensure the completeness and correctness of the register. An error was identified and DNRME staff made the necessary changes to the register. In this instance it would appear that the changes were made without going through the process of creating formal dealings.*

33. Titles Registry later reiterated to OIC that the Project was undertaken to ensure it had recorded all reserves and land held by other agencies under the Nature Conservation Act<sup>46</sup> as follows:

*... the Department undertook a project to ensure it had recorded all Land Act reserves and land held by other agencies, including those held by (what is now) DES under the Nature Conversation Act. At that stage it appears likely that it was realised that the land was incorrectly identified in the register as a D&O reserve, and it was corrected to match the Nature Conversation (Protected Area) regulation from 1994 whereby it became a resource reserve – the regulation would have been considered to be sufficient evidence for the correction.*

34. SLAM initially indicated that, in relation to the Lot 1 application, any changes would have been made by legislative instrument.<sup>47</sup> Relevantly, the provisions of the *Nature Conservation (Declaration of Nature Refuges) Amendment Regulation (No. 1) 1994 (Qld) (Regulation)* refer to the purpose of Lots 1 and 3 having been changed from D&O to Resources Reserve in 1994.<sup>48</sup>

<sup>42</sup> Including within Titles Registry and SLAM.

<sup>43</sup> Submission dated 14 January 2020.

<sup>44</sup> Submission to OIC dated 14 January 2020.

<sup>45</sup> Submission to OIC dated 3 June 2020.

<sup>46</sup> Submission dated 3 June 2020.

<sup>47</sup> Submission to OIC made in a telephone call on 15 April 2020.

<sup>48</sup> Schedule 4 of the Regulation, pages 53-54. The changes made by this Regulation are the substance of CYLC's concerns that dedications were made without proper authority.

35. SLAM submitted that its recordkeeping system in 2007 was electronic and *'there is no evidence that SLAM gave any direction to the Land Registry to amend the title'* ie Lot 1.<sup>49</sup> SLAM subsequently confirmed that:<sup>50</sup>

*... there are no alternative searches that can be conducted, that haven't been conducted for the requested timeframes. [SLAM] do not have records of the documents the applicant claims to exist.*

*As confirmed during previous the searches [sic], the evidence of a delegate under the Land Act 1994 deciding to revoke the Departmental and Official reserves (the subject of the search) and subsequent advice/request to the Land Registry to record the cancellation and update the Automatic Titling System does not exist. The Land Registry, as they have confirmed, undertook an internal project to tidy up the information in the Land Registry.*

*In relation to the submissions in the applicants [sic] letter of 10 July 2020, there is no additional information that SLAM holds in relation to the request. Any decision made would have to have been published in the government gazette to take effect as required by the Land Act 1994 at that time. There is no record that the decisions to revoke the Departmental and Official Reserves were made under the Land Act 1994.*

## Findings

36. Given the regulated nature of the Titles Registry and ATS, it seems reasonable to expect that changes to the dedicated purpose of any land holding would require a corresponding explanatory instrument to be recorded in the ATS. It was on this basis that I requested the Department to conduct further searches and inquiries for documents to support the change in purpose to Lots 1 and 3. I am satisfied that the Department conducted searches in relevant areas, based on the scope of the applications, ie. Titles Registry and SLAM, and that the searches were conducted by officers with requisite knowledge of operational areas and relevant recordkeeping systems.<sup>51</sup>
37. Having considered the further information provided by the Department regarding the Project, I am satisfied that the Department, in addition to conducting relevant searches and inquiries, has satisfactorily explained<sup>52</sup> the reason why further documents do not exist. It appears that the Project had an (unforeseen) impact on the Department's ordinary recordkeeping practices, resulting in the subject changes being made administratively, without formal dealings or supporting titles instruments being created, as would have ordinarily occurred in the ATS.
38. The applicant has validly pointed to requirements of the Land Act and other instances where dealings documents have been created to 'correct' the register. These submissions demonstrate the recordkeeping practices and procedures that it would be reasonable to expect the Department to follow, in the ordinary course. However, as the Department has conceded, the Project resulted in changes to the ATS in relation to the purpose of Lots 1 and 3 being made administratively *'without going through the process of creating formal dealings'*.<sup>53</sup>
39. I consider the finding of nonexistence is supported by the communications from the relevant Minister, and DATSIP, as quoted above at paragraph 29. Those

<sup>49</sup> Submission to OIC dated 3 June 2020.

<sup>50</sup> Submission to OIC dated 12 August 2020.

<sup>51</sup> I acknowledge that there are some points of difference between the submissions made by SLAM and the views expressed by the Titles Registry particularly in relation to the original searches. However, given my findings in this matter, it has not been necessary to resolve those inconsistencies.

<sup>52</sup> See paragraphs 32, 33 and 35 of these reasons.

<sup>53</sup> Submission to OIC dated 3 June 2020.



communications concede that ‘a gazettal notice cannot be found’<sup>54</sup> and that ‘it has not been possible to find evidence of the cancellation of the Departmental and Official Purposes Reserves’.<sup>55</sup> I also consider that the following evidence lends support to the conclusion that the subject changes were made administratively:

- the Minister’s acknowledgement of an ‘*administrative error*’ which resulted in the dedication of Resource Reserves; and
  - the QON reference to instructions given by the former Environmental Protection Authority.<sup>56</sup>
40. As demonstrated by the media coverage<sup>57</sup> and other communications<sup>58</sup>, the dedication of Lots 1 and 3 as Resource Reserves<sup>59</sup> has been the subject of significant contention for a number of years. While there does not appear to be a definitive explanation for exactly what transpired between 2000 and 2008, I consider the available evidence supports the conclusion that the subject changes to the ATS were made administratively, without formal dealings documents or titles instruments being created.
41. On the basis of my findings in paragraphs 36 to 40 above, including the searches and undertaken by the Department, I am satisfied that there are reasonable grounds to be satisfied that dealings documents, titles instruments, or any other documents, to substantiate the changes to the ATS (in relation to changing the purpose of Lots 1 and 3 from D&O to Resources Reserve), do not exist. Accordingly, access to such information may be refused under section 47(3)(e) of the RTI Act.<sup>60</sup>

## DECISION

42. I vary the decisions under review and find that access to further documents may be refused under section 47(3)(e) of the RTI Act because they are nonexistent under section 52(1)(a) of the RTI Act.
43. I have made these decisions as a delegate of the Information Commissioner, under section 145 of the RTI Act.

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**K Shepherd**  
**Assistant Information Commissioner**

**Date: 16 October 2020**

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<sup>54</sup> Letter from DATSIP to Balkanu dated 16 May 2019.

<sup>55</sup> Letter from Hon Leeanne Enoch to Balkanu dated 9 May 2019.

<sup>56</sup> However, I make no finding on whether the changes were made erroneously, or without relevant authority. Those matters are beyond my external review jurisdiction under the RTI Act.

<sup>57</sup> See footnote 7.

<sup>58</sup> Quoted at paragraph 29 of these reasons.

<sup>59</sup> By the Regulation.

<sup>60</sup> In accordance with section 52(1)(a) of the RTI Act.

## APPENDIX

### Significant procedural steps

Date	Event
17 October 2019	OIC received the application for external review for 314921.
22 October 2019	OIC requested preliminary documents from the Department.
24 October 2019	OIC received the preliminary documents from the Department.
5 December 2019	The applicant requested an update.
11 December 2019	OIC advised the applicant and Department that the application for external review had been accepted. OIC requested search information from the Department.
19 December 2019	OIC received the application for external review for 315083.
20 December 2019	OIC requested preliminary documents from the Department for 315083.
14 January 2020	OIC received search records from the Department for 314921.
20 January 2020	OIC received the preliminary documents from the Department for 315083.
19 February 2020	OIC advised the applicant and Department that the application for external review for 315083 had been accepted. OIC requested further information from the Department for 315083.
20 March 2020	OIC received the further information from the Department for 315083.
27 March 2020	OIC provided the applicant with an update for 315083.
3 April 2020	OIC requested further search information from the Department for 314921.
6 April 2020	OIC received the further search information from the Department for 314921.
15 April 2020	OIC requested search information from the Department for 315083.
20 April 2020	OIC provided the applicant with an update for 314921.
29 April 2020	OIC received further search information from the Department for 315083.
8 May 2020	OIC requested further information from the Department for 314921. OIC provided the applicant with an update.
3 June 2020	OIC received the requested further information from the Department for 314921.
26 June 2020	OIC conveyed a preliminary view to the applicant for both reviews.
10 July 2020	OIC received a submission from the applicant for both reviews, contesting the preliminary view.
20 July 2020	OIC requested further information from the Department for both reviews.
11 August 2020	OIC provided the applicant with an update for both reviews.
12 August 2020	OIC received the further information from the Department for both reviews.
20 August 2020	OIC conveyed a further preliminary view to the applicant for both reviews.
3 September 2020	OIC received further submissions from the applicant for both reviews.