

NOTICE OF FILING

Details of Filing

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| Document Lodged: | Concise Statement |
| Court of Filing | FEDERAL COURT OF AUSTRALIA (FCA) |
| Date of Lodgment: | 3/11/2023 2:09:19 PM AEDT |
| Date Accepted for Filing: | 3/11/2023 2:21:01 PM AEDT |
| File Number: | VID926/2023 |
| File Title: | AUSTRALIAN SECURITIES & INVESTMENTS COMMISSION v TELSTRA SUPER PTY LTD ACN 007 422 522 |
| Registry: | VICTORIA REGISTRY - FEDERAL COURT OF AUSTRALIA |



Sia Lagos

Registrar

Important Information

This Notice has been inserted as the first page of the document which has been accepted for electronic filing. It is now taken to be part of that document for the purposes of the proceeding in the Court and contains important information for all parties to that proceeding. It must be included in the document served on each of those parties.

The date of the filing of the document is determined pursuant to the Court's Rules.



Concise statement

No VID ____ of 2023

Federal Court of Australia

District Registry: Victoria

Division: General

Australian Securities and Investments Commission

Plaintiff

Telstra Super Pty Ltd (ACN 007 422 522)

Defendant

A. IMPORTANT FACTS GIVING RISE TO CLAIM

A.1 Introduction

1. The Defendant (**Telstra Super**) is the trustee of the Telstra Superannuation Scheme, a regulated superannuation fund within the meaning of the *Superannuation Industry Superannuation Act 1993* (Cth). Telstra Super holds Australian financial services licence number 236709 and is a financial services licensee within the meaning of the *Corporations Act 2001* (Cth) (the **Act**).
2. This proceeding concerns contraventions by Telstra Super of its obligations under the Act concerning the manner in which it handled complaints by retail clients through its internal dispute resolution procedure. As set out in detail below, between 6 December 2021 and 23 May 2023, Telstra Super failed to comply with timeframes required for an IDR response, did not inform complainants about the reasons for the delay or their external dispute resolution rights, and did not ensure that its internal dispute resolution procedure operated efficiently, honestly and fairly. Telstra Super therefore contravened ss 912A(1)(a) and (g) and (5A) of the Act.

A.2 Telstra Super's obligations under the Act

3. By reason of s 912A(1)(g)(i) and (2) of the Act, a financial services licensee must have a "dispute resolution system" including an "internal dispute resolution procedure" that complies with standards and requirements made or approved by ASIC. That procedure

Filed on behalf of (name & role of party) Australian Securities and Investments Commission, the Plaintiff
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must cover complaints against the licensee made by retail clients in connection with the provision of all financial services covered by the licence. The dispute resolution system must also include membership of the AFCA scheme within the meaning of the Act.

4. In 2020, ASIC made the *ASIC Corporations, Credit and Superannuation (Internal Dispute Resolution) Instrument 2020/98* (the **IDR Instrument**). The IDR Instrument applies in relation to complaints received on or after 5 October 2021 by a financial firm (including a financial services licensee or a trustee of a regulated superannuation fund).
5. Section 5(1) of the IDR Instrument provides that ASIC makes and approves the standards and requirements mentioned in certain paragraphs of *Regulatory Guide 271: Internal Dispute Resolution* (the **Regulatory Guide**).
6. Section 7(1) of the IDR Instrument relevantly provides that Pt 7.6 of the Act applies in relation to financial services licensees as if s 912A(1)(g) were modified or varied by inserting paragraph (ia) in the following terms:

in relation to an internal dispute resolution procedure for the purposes of paragraph (2)(a)—
comply with the internal dispute resolution procedure; and

A.3 Telstra Super's internal dispute resolution procedure

7. At all relevant times on and after 5 October 2021, the internal dispute resolution procedure for Telstra Super was set out in internal policy documents titled *Complaints Policy – Internal* (the **Complaints Policy**) and *Complaints Business Rules* (the **Business Rules**). These documents were amended from time to time and were revised with effect from October 2021 due to the implementation of the Regulatory Guide.
8. At all relevant times on and after 5 October 2021, the Complaints Policy and the Business Rules included the following requirements, each of which was based on a standard or requirement mentioned in the Regulatory Guide:
 - (a) The Complaints Officer must maintain a Complaints Register. Staff must ensure that all contact, conversations and actions with a complainant are documented and retained in the Complaints Register.
 - (b) An “IDR response” must include the final outcome of the complaint, and the complainant’s right to take the complaint to the Australian Financial Complaints Authority (**AFCA**) and the contact details for AFCA.
 - (c) An IDR response must be provided to the complainant promptly but no later than the prescribed maximum timeframe. For superannuation complaints, the prescribed maximum timeframe is 45 days after receipt of the complaint.
 - (d) Telstra Super is not required to provide a complainant with an IDR response within the maximum timeframe if certain circumstances exist:

- (i) There must be no reasonable opportunity for Telstra Super to provide the IDR response within the maximum timeframe because resolution of the individual complaint is particularly complex, and/or circumstances beyond Telstra Super's control are causing complaint management delays (the **delay criteria**).
 - (ii) If the complaint will not be resolved before the maximum timeframe expires, Telstra Super must give the complainant an "IDR delay notification" that informs the complainant about the reasons for the delay, their right to complain to AFCA if they are dissatisfied, and the contact details for AFCA.
- (e) The internal dispute resolution process must be resourced so that it operates fairly, effectively and efficiently.
9. At all relevant times on and after 5 October 2021, Telstra Super was required to comply with each of the requirements set out in paragraph 8 above (the **Complaint Requirements**).

A.4 Failures to comply with the Complaint Requirements

10. Between 22 October 2021 and 13 January 2023, Telstra Super received 337 superannuation complaints (excluding complaints about superannuation death benefit distributions) (the **relevant complaints**). These superannuation complaints are listed at Schedule A to this Concise Statement. Telstra Super failed to comply with the Complaint Requirements in relation to the relevant complaints as follows.
11. Between 7 December 2021 and 23 May 2023, Telstra Super did not comply with the Complaint Requirements for the maximum timeframe for issuing IDR responses referred to in paragraph 8(c) above in the following instances:¹
- (a) For 22 complaints, Telstra Super did not send the complainant an IDR response within 45 days in circumstances where an IDR delay notification was not sent to the complainant. Three of these complaints had an IDR response sent 105, 133 and 276 days after the complaint was received.
 - (b) For 31 complaints, Telstra Super did not send the complainant an IDR response within 45 days, and did not send the complainant an IDR delay notification until after the maximum timeframe had expired. Thirteen of these complaints had an IDR response sent between 105 and 191 days after the complaint was received.

¹ The cells shaded in Schedule A identify the instances in which IDR responses and IDR delay notifications were issued after 45 days.

- (c) For 53 complaints, Telstra Super sent the complainant an IDR delay notification when the delay criteria were not satisfied, including 8 complaints on which no work was recorded as having been done at the time the IDR delay notification was sent.
12. Between 7 December 2021 and 22 February 2023, Telstra Super did not comply with the Complaint Requirements for the content of IDR responses and IDR delay notifications referred to in paragraph 8(b) and (d) above in the following instances:
- (a) For 22 complaints, the IDR response omitted to inform the complainant about their right to take the complaint to AFCA or include AFCA's contact details.
 - (b) For 1 complaint, the IDR delay notification omitted to inform the complainant about their right to take the complaint to AFCA or include AFCA's contact details.
 - (c) For 85 complaints, the IDR delay notification did not inform the complainant about the reasons for the delay, stating only that "the investigation into the cause of your complaint is ongoing" or words to materially the same effect.
13. Between 7 December 2021 and 23 May 2023, Telstra Super did not comply with the Complaint Requirements by failing to provide adequate resourcing as referred to in paragraph 8(e) above.
14. By reason of the matters referred to in paragraphs 10 to 12 above, and the additional matters referred to in paragraph 16 below, Telstra Super's internal dispute resolution process did not operate fairly, effectively and efficiently.
15. A cause of the failure of Telstra Super's internal dispute resolution process to operate fairly, effectively and efficiently was that Telstra Super did not provide adequate resources, including sufficient and adequately trained staff, to meet the required standard.

A.5 Failure to ensure financial services were provided efficiently, honestly and fairly

16. Between 7 December 2021 and 23 May 2023, Telstra Super failed to do all things necessary to ensure that the financial services covered by its licence were provided efficiently, honestly and fairly in breach of s 912A(1)(a) of the Act, by reason of the following matters:
- (a) the matters referred to in paragraphs 10 to 15 above, including:
 - (i) the frequency, nature and extent of the instances of non-compliance referred to in those paragraphs;
 - (ii) that, for about 30 per cent of the relevant complaints, Telstra Super did not comply with the maximum timeframe for issuing IDR responses and the delay

criteria were not satisfied or no IDR delay notification was sent (either before the expiry of the maximum timeframe or at all); and

- (iii) that, for about 30 per cent of the relevant complaints, Telstra Super did not comply with one or more requirements for the content of IDR responses or IDR delay notifications;
- (b) Telstra Super sent IDR delay notifications when it knew or ought reasonably to have known that the delay criteria were not satisfied, or without regard to whether the delay criteria were satisfied;
- (c) Telstra Super sent IDR delay notifications for complaints on which no work was recorded as having been done; and insofar as Telstra Super represented in those IDR delay notifications that an investigation into the cause of the complaint was ongoing, those representations were false or misleading; or
- (d) Telstra Super knew or believed, or ought to have known or believed, that it had not provided adequate staff resources to enable Telstra Super to comply with the maximum timeframe for issuing IDR responses, to ensure that the internal dispute resolution process operated fairly, effectively and efficiently, or otherwise to comply with its internal dispute resolution procedure.

B. RELIEF SOUGHT FROM THE COURT

- 17. ASIC seeks the relief set out in the accompanying Originating Process, including declarations of contravention under s 21 of the *Federal Court of Australia Act 1976* (Cth) and/or ss 1101B(1) and/or 1317E(1) of the Act, pecuniary penalty orders under s 1317G(1) of the Act, other orders under s 1101B(1) of the Act, and costs against the Defendant.

C. PRIMARY LEGAL GROUNDS FOR THE RELIEF SOUGHT

- 18. By reason of the matters set out in paragraphs 7 to 13 above, Telstra Super failed in each of the identified instances to comply with its internal dispute resolution procedure and thereby contravened s 912A(1)(g) of the Act as in effect modified or varied by s 7(1) of the IDR Instrument between 7 December 2021 and 23 May 2023. Further, by reason of s 1317QA of the Act, Telstra Super committed a separate contravention in respect of each day during which the contraventions set out in paragraph 11 above occurred.
- 19. By reason of the matters set out in paragraphs 7 to 16 above, Telstra Super failed to do all things necessary to ensure that it provided services as a superannuation trustee efficiently, honestly and fairly and thereby contravened s 912A(1)(a) of the Act between 7 December 2021 and 23 May 2023.

20. By reason of the above contraventions of ss 912A(1)(a) and (g), Telstra Super contravened s 912A(5A) of the Act between 7 December 2021 and 23 May 2023.

D. ALLEGED HARM

21. The impact of the contraventions varied depending on the nature of the underlying complaint and the extent of Telstra Super's non-compliance with its internal dispute resolution procedure. Complainants experienced distress and inconvenience due to the delayed resolution of complaints and the lack of communication of the reasons for the delays. In some cases, complainants suffered financial loss while the complaint remained unresolved or experienced delays in obtaining compensation or access to moneys to which they were found to be entitled.

Date: 3 November 2023



Signed by Nick Kelton
Lawyer for the Plaintiff

This Concise Statement was prepared by Elizabeth Bennett SC and Minh-Quan Nguyen.

Certificate of lawyer

I, Nick Kelton, certify to the Court that, in relation to the Concise Statement filed on behalf of the Plaintiff, the factual and legal material available to me at present provides a proper basis for each allegation in the Concise Statement.

Date: 3 November 2023



Signed by Nick Kelton

Lawyer for the Plaintiff

SCHEDULE A – RELEVANT COMPLAINTS

| Complainant | Complaint ID | Date of complaint | Days taken for delay notification | Days taken for IDR response | Contravention of s 912A(1)(g) of the Act (cross-referenced to paragraphs of the Concise Statement) | | | | | | | |
|----------------|--------------|-------------------|-----------------------------------|-----------------------------|--|------------|------------|------------|------------|------------|----------------|-----------------|
| | | | | | Para 11(a) | Para 11(b) | Para 11(c) | Para 12(a) | Para 12(b) | Para 12(c) | Para 16(a)(ii) | Para 16(a)(iii) |
| Complainant 1 | 1001387 | 22/10/2021 | N/A | 41 | | | | | | | | |
| Complainant 2 | 1001429 | 22/10/2021 | N/A | 105 | X | | | | | | X | |
| Complainant 3 | 1001409 | 25/10/2021 | N/A | N/A | | | | | | | | |
| Complainant 4 | 1001426 | 25/10/2021 | N/A | 46 | X | | | | | | X | |
| Complainant 5 | 1001451 | 26/10/2021 | N/A | 44 | | | | | | | | |
| Complainant 6 | 1001880 | 26/10/2021 | N/A | 37 | | | | | | | | |
| Complainant 7 | 1001466 | 27/10/2021 | N/A | 44 | | | | | | | | |
| Complainant 8 | 1001521 | 27/10/2021 | N/A | 43 | | | | | | | | |
| Complainant 9 | 1001586 | 27/10/2021 | N/A | 57 | X | | | | | | X | |
| Complainant 10 | 1001484 | 28/10/2021 | N/A | N/A | | | | | | | | |
| Complainant 11 | 1001541 | 28/10/2021 | N/A | 14 | | | | | | | | |
| Complainant 12 | 1001506 | 01/11/2021 | N/A | 43 | | | | | | | | |
| Complainant 13 | 1001516 | 03/11/2021 | N/A | 29 | | | | | | | | |
| Complainant 14 | 1001568 | 03/11/2021 | N/A | 7 | | | | | | | | |
| Complainant 15 | 1001534 | 04/11/2021 | N/A | 43 | | | | | | | | |
| Complainant 16 | 1001537 | 04/11/2021 | 50 | 77 | | X | | | | X | X | X |
| Complainant 17 | 1001556 | 05/11/2021 | N/A | 20 | | | | | | | | |
| Complainant 18 | 1000628 | 07/11/2021 | 47 | 72 | | X | | | | X | X | X |
| Complainant 19 | 1001571 | 08/11/2021 | 45 | 121 | | | | X | | X | | X |
| Complainant 20 | 1001577 | 08/11/2021 | N/A | 15 | | | | | | | | |
| Complainant 21 | 1001584 | 08/11/2021 | N/A | 44 | | | | | | | | |

| Complainant | Complaint ID | Date of complaint | Days taken for delay notification | Days taken for IDR response | Contravention of s 912A(1)(g) of the Act (cross-referenced to paragraphs of the Concise Statement) | | | | | | | |
|----------------|--------------|-------------------|-----------------------------------|-----------------------------|--|------------|------------|------------|------------|------------|----------------|-----------------|
| | | | | | Para 11(a) | Para 11(b) | Para 11(c) | Para 12(a) | Para 12(b) | Para 12(c) | Para 16(a)(ii) | Para 16(a)(iii) |
| Complainant 22 | 1001605 | 09/11/2021 | N/A | 45 | | | | | | | | |
| Complainant 23 | 1001677 | 09/11/2021 | N/A | 43 | | | | | | | | |
| Complainant 24 | 1001699 | 09/11/2021 | 45 | 56 | | | X | | | | X | |
| Complainant 25 | 1002151 | 09/11/2021 | N/A | 69 | X | | | X | | | X | X |
| Complainant 26 | 1001719 | 11/11/2021 | N/A | 14 | | | | | | | | |
| Complainant 27 | 1001705 | 12/11/2021 | 42 | 108 | | | X | | | | X | |
| Complainant 28 | 1001711 | 12/11/2021 | 42 | 53 | | | | | | | | |
| Complainant 29 | 1001712 | 12/11/2021 | N/A | 4 | | | | | | | | |
| Complainant 30 | 1002040 | 13/11/2021 | N/A | 47 | X | | | | | | X | |
| Complainant 31 | 1001739 | 15/11/2021 | N/A | 24 | | | | | | | | |
| Complainant 32 | 1001738 | 15/11/2021 | 39 | 52 | | | X | | | | X | |
| Complainant 33 | 1001743 | 15/11/2021 | 39 | 77 | | | X | X | | | X | X |
| Complainant 34 | 1001865 | 16/11/2021 | N/A | 37 | | | | | | | | |
| Complainant 35 | 1001853 | 16/11/2021 | N/A | 1 | | | | | | | | |
| Complainant 36 | 1001764 | 16/11/2021 | N/A | 66 | X | | | | | | X | |
| Complainant 37 | 1001853 | 16/11/2021 | N/A | N/A | | | | | | | | |
| Complainant 38 | 1001830 | 17/11/2021 | N/A | 37 | | | | | | | | |
| Complainant 39 | 1001836 | 17/11/2021 | 37 | N/A | | | | | | | | |
| Complainant 40 | 1001859 | 17/11/2021 | 37 | N/A | | | | | | | | |
| Complainant 41 | 1002062 | 18/11/2021 | 36 | 49 | | | X | | | | X | |
| Complainant 42 | 1001866 | 18/11/2021 | N/A | 42 | | | | | | | | |
| Complainant 43 | 1001882 | 18/11/2021 | 36 | 68 | | | X | | | X | X | X |
| Complainant 44 | 1001895 | 19/11/2021 | N/A | 12 | | | | | | | | |

| Complainant | Complaint ID | Date of complaint | Days taken for delay notification | Days taken for IDR response | Contravention of s 912A(1)(g) of the Act (cross-referenced to paragraphs of the Concise Statement) | | | | | | | |
|----------------|--------------|-------------------|-----------------------------------|-----------------------------|--|------------|------------|------------|------------|------------|----------------|-----------------|
| | | | | | Para 11(a) | Para 11(b) | Para 11(c) | Para 12(a) | Para 12(b) | Para 12(c) | Para 16(a)(ii) | Para 16(a)(iii) |
| Complainant 45 | 1001890 | 19/11/2021 | 41 | 60 | | | X | | | X | X | X |
| Complainant 46 | 1001961 | 19/11/2021 | 41 | 56 | | | | | | | | |
| Complainant 47 | 1001982 | 22/11/2021 | 32 | 53 | | | | | | | | |
| Complainant 48 | 1003636 | 22/11/2021 | N/A | 133 | X | | | | | | X | |
| Complainant 49 | 1001967 | 23/11/2021 | 31 | 365 | | | | | | X | | X |
| Complainant 50 | 1002076 | 23/11/2021 | N/A | 276 | X | | | | | | X | |
| Complainant 51 | 1002025 | 24/11/2021 | N/A | 42 | | | | | | | | |
| Complainant 52 | 1002036 | 24/11/2021 | N/A | 42 | | | | | | | | |
| Complainant 53 | 1002028 | 25/11/2021 | N/A | 42 | | | | | | | | |
| Complainant 54 | 1002038 | 26/11/2021 | N/A | 12 | | | | | | | | |
| Complainant 55 | 1002074 | 30/11/2021 | N/A | 44 | | | | | | | | |
| Complainant 56 | 1002078 | 01/12/2021 | N/A | 5 | | | | | | | | |
| Complainant 57 | 1002092 | 01/12/2021 | N/A | 6 | | | | X | | | | X |
| Complainant 58 | 1002097 | 01/12/2021 | N/A | 6 | | | | X | | | | X |
| Complainant 59 | 1002107 | 02/12/2021 | 43 | 63 | | | | | | | | |
| Complainant 60 | 1002103 | 02/12/2021 | N/A | 91 | X | | | | | | X | |
| Complainant 61 | 1002129 | 03/12/2021 | 45 | 63 | | | X | | | | X | |
| Complainant 62 | 1002134 | 03/12/2021 | N/A | 77 | X | | | | | | X | |
| Complainant 63 | 1002149 | 06/12/2021 | 46 | 143 | | X | | | | X | X | X |
| Complainant 64 | 1002198 | 07/12/2021 | 44 | 51 | | | X | | | | X | |
| Complainant 65 | 1002191 | 07/12/2021 | 49 | 77 | | X | | | | X | X | X |
| Complainant 66 | 1002260 | 13/12/2021 | N/A | 30 | | | | | | | | |
| Complainant 67 | 1002306 | 13/12/2021 | 31 | 31 | | | | X | X | | | X |

| Complainant | Complaint ID | Date of complaint | Days taken for delay notification | Days taken for IDR response | Contravention of s 912A(1)(g) of the Act (cross-referenced to paragraphs of the Concise Statement) | | | | | | | |
|----------------|--------------|-------------------|-----------------------------------|-----------------------------|--|------------|------------|------------|------------|------------|----------------|-----------------|
| | | | | | Para 11(a) | Para 11(b) | Para 11(c) | Para 12(a) | Para 12(b) | Para 12(c) | Para 16(a)(ii) | Para 16(a)(iii) |
| Complainant 68 | 1002275 | 13/12/2021 | 45 | 148 | | | X | | | X | X | X |
| Complainant 69 | 1002298 | 14/12/2021 | 48 | 99 | | X | | | | X | X | X |
| Complainant 70 | 1002286 | 14/12/2021 | N/A | N/A | | | | | | | | |
| Complainant 71 | 1002308 | 15/12/2021 | 9 | 51 | | | X | | | | X | |
| Complainant 72 | 1002319 | 15/12/2021 | N/A | 44 | | | | | | | | |
| Complainant 73 | 1002314 | 15/12/2021 | N/A | 76 | X | | | | | | X | |
| Complainant 74 | 1002321 | 16/12/2021 | N/A | 35 | | | | | | | | |
| Complainant 75 | 1003769 | 17/12/2021 | N/A | N/A | | | | | | | | |
| Complainant 76 | 1001900 | 18/12/2021 | N/A | 12 | | | | | | | | |
| Complainant 77 | 1002360 | 20/12/2021 | 45 | 52 | | | X | | | X | X | X |
| Complainant 78 | 1002363 | 20/12/2021 | 45 | 134 | | | | | | | | |
| Complainant 79 | 1002438 | 22/12/2021 | N/A | N/A | | | | | | | | |
| Complainant 80 | 1002408 | 22/12/2021 | 48 | 160 | | X | | | | X | X | X |
| Complainant 81 | 1002458 | 24/12/2021 | N/A | 6 | | | | | | | | |
| Complainant 82 | 1002512 | 29/12/2021 | N/A | 43 | | | | | | | | |
| Complainant 83 | 1002517 | 31/12/2021 | N/A | 45 | | | | | | | | |
| Complainant 84 | 1002927 | 04/01/2022 | N/A | 48 | X | | | | | | X | |
| Complainant 85 | 1002568 | 05/01/2022 | N/A | 41 | | | | | | | | |
| Complainant 86 | 1002537 | 05/01/2022 | 44 | 63 | | | X | | | X | X | X |
| Complainant 87 | 1002543 | 06/01/2022 | 46 | 84 | | X | | | | X | X | X |
| Complainant 88 | 1002714 | 07/01/2022 | 46 | 48 | | X | | | | X | X | X |
| Complainant 89 | 1002558 | 07/01/2022 | 45 | 52 | | | X | | | X | X | X |
| Complainant 90 | 1002563 | 10/01/2022 | N/A | 51 | X | | | | | | X | |

| Complainant | Complaint ID | Date of complaint | Days taken for delay notification | Days taken for IDR response | Contravention of s 912A(1)(g) of the Act (cross-referenced to paragraphs of the Concise Statement) | | | | | | | | |
|-----------------|--------------|-------------------|-----------------------------------|-----------------------------|--|------------|------------|------------|------------|------------|----------------|-----------------|---|
| | | | | | Para 11(a) | Para 11(b) | Para 11(c) | Para 12(a) | Para 12(b) | Para 12(c) | Para 16(a)(ii) | Para 16(a)(iii) | |
| Complainant 91 | 1002600 | 11/01/2022 | N/A | 44 | | | | | | | | | |
| Complainant 92 | 1002670 | 11/01/2022 | N/A | 7 | | | | X | | | | | X |
| Complainant 93 | 1002742 | 12/01/2022 | 48 | 57 | | X | | | | X | X | X | X |
| Complainant 94 | 1002629 | 14/01/2022 | 46 | 56 | | X | | | | X | X | X | X |
| Complainant 95 | 1002661 | 16/01/2022 | N/A | 39 | | | | | | | | | |
| Complainant 96 | 1002895 | 27/01/2022 | 42 | 55 | | | X | | | X | X | X | X |
| Complainant 97 | 1002804 | 30/01/2022 | N/A | 39 | | | | | | | | | |
| Complainant 98 | 1002915 | 31/01/2022 | 49 | 56 | | X | | | | X | X | X | X |
| Complainant 99 | 1002857 | 01/02/2022 | 52 | 112 | | X | | | | X | X | X | X |
| Complainant 100 | 1002917 | 06/02/2022 | N/A | 11 | | | | | | | | | |
| Complainant 101 | 1002976 | 07/02/2022 | N/A | 17 | | | | | | | | | |
| Complainant 102 | 1002939 | 08/02/2022 | 43 | 73 | | | | | | | | | |
| Complainant 103 | 1002984 | 09/02/2022 | 44 | 83 | | | X | | | X | X | X | X |
| Complainant 104 | 1002971 | 09/02/2022 | 44 | 91 | | | X | | | | X | | |
| Complainant 105 | 1002991 | 10/02/2022 | 43 | 61 | | | X | | | X | X | X | X |
| Complainant 106 | 1003045 | 11/02/2022 | N/A | 7 | | | | | | | | | |
| Complainant 107 | 1003050 | 11/02/2022 | N/A | N/A | | | | | | | | | |
| Complainant 108 | 1003050 | 11/02/2022 | N/A | 42 | | | | X | | | | | X |
| Complainant 109 | 1003064 | 14/02/2022 | N/A | N/A | | | | | | | | | |
| Complainant 110 | 1003073 | 14/02/2022 | N/A | 46 | X | | | | | | X | | |
| Complainant 111 | 1003118 | 14/02/2022 | N/A | 11 | | | | X | | | | | X |
| Complainant 112 | 1003096 | 16/02/2022 | N/A | 43 | | | | | | | | | |
| Complainant 113 | 1003214 | 18/02/2022 | N/A | 49 | X | | | | | | X | | |

| Complainant | Complaint ID | Date of complaint | Days taken for delay notification | Days taken for IDR response | Contravention of s 912A(1)(g) of the Act (cross-referenced to paragraphs of the Concise Statement) | | | | | | | |
|-----------------|--------------|-------------------|-----------------------------------|-----------------------------|--|------------|------------|------------|------------|------------|----------------|-----------------|
| | | | | | Para 11(a) | Para 11(b) | Para 11(c) | Para 12(a) | Para 12(b) | Para 12(c) | Para 16(a)(ii) | Para 16(a)(iii) |
| Complainant 114 | 1003154 | 21/02/2022 | 46 | 59 | | X | | | | X | X | X |
| Complainant 115 | 1003148 | 21/02/2022 | N/A | 43 | | | | | | | | |
| Complainant 116 | 1003161 | 21/02/2022 | N/A | 45 | | | | | | | | |
| Complainant 117 | 1003191 | 23/02/2022 | 44 | 90 | | | X | | | X | X | X |
| Complainant 118 | 1003220 | 24/02/2022 | 43 | 124 | | | X | | | X | X | X |
| Complainant 119 | 1003227 | 25/02/2022 | 45 | 172 | | | | | | | | |
| Complainant 120 | 1003233 | 28/02/2022 | N/A | 43 | | | | | | | | |
| Complainant 121 | 1003235 | 28/02/2022 | N/A | 42 | | | | | | | | |
| Complainant 122 | 1003275 | 01/03/2022 | N/A | N/A | | | | | | | | |
| Complainant 123 | 1003277 | 01/03/2022 | 44 | 52 | | | | | | X | | X |
| Complainant 124 | 1003446 | 02/03/2022 | 63 | 105 | | X | | | | X | X | X |
| Complainant 125 | 1003304 | 04/03/2022 | N/A | N/A | | | | | | | | |
| Complainant 126 | 1003312 | 04/03/2022 | 46 | 49 | | X | | | | X | X | X |
| Complainant 127 | 1003306 | 04/03/2022 | N/A | 39 | | | | | | | | |
| Complainant 128 | 1003376 | 04/03/2022 | 53 | 88 | | X | | | | X | X | X |
| Complainant 129 | 1003352 | 08/03/2022 | 49 | 77 | | X | | | | X | X | X |
| Complainant 130 | 1003382 | 08/03/2022 | N/A | 45 | | | | | | | | |
| Complainant 131 | 1003460 | 08/03/2022 | N/A | 34 | | | | | | | | |
| Complainant 132 | 1003329 | 10/03/2022 | N/A | 40 | | | | X | | | | X |
| Complainant 133 | 1003381 | 10/03/2022 | N/A | 43 | | | | | | | | |
| Complainant 134 | 1003412 | 11/03/2022 | 46 | 74 | | X | | | | X | X | X |
| Complainant 135 | 1003448 | 16/03/2022 | N/A | 42 | | | | | | | | |
| Complainant 136 | 1003486 | 20/03/2022 | N/A | 30 | | | | | | | | |

| Complainant | Complaint ID | Date of complaint | Days taken for delay notification | Days taken for IDR response | Contravention of s 912A(1)(g) of the Act (cross-referenced to paragraphs of the Concise Statement) | | | | | | | | |
|-----------------|--------------|-------------------|-----------------------------------|-----------------------------|--|------------|------------|------------|------------|------------|----------------|-----------------|---|
| | | | | | Para 11(a) | Para 11(b) | Para 11(c) | Para 12(a) | Para 12(b) | Para 12(c) | Para 16(a)(ii) | Para 16(a)(iii) | |
| Complainant 137 | 1003559 | 21/03/2022 | 44 | N/A | | | | | | | | | |
| Complainant 138 | 1003493 | 22/03/2022 | 43 | 143 | | | X | | | X | X | X | |
| Complainant 139 | 1003546 | 23/03/2022 | N/A | 35 | | | | | | | | | |
| Complainant 140 | 1003647 | 26/03/2022 | N/A | 45 | | | | | | | | | |
| Complainant 141 | 1003584 | 28/03/2022 | 45 | 158 | | | X | | | X | X | X | |
| Complainant 142 | 1003592 | 29/03/2022 | N/A | 37 | | | | | | | | | |
| Complainant 143 | 1003704 | 31/03/2022 | 46 | 70 | | X | | | | X | X | X | |
| Complainant 144 | 1003608 | 31/03/2022 | 42 | 137 | | | | | | X | | X | |
| Complainant 145 | 1003630 | 01/04/2022 | N/A | 35 | | | | | | | | | |
| Complainant 146 | 1003790 | 12/04/2022 | N/A | 34 | | | | | | | | | |
| Complainant 147 | 1003802 | 13/04/2022 | 48 | 82 | | X | | | | X | X | X | |
| Complainant 148 | 1003816 | 19/04/2022 | N/A | 35 | | | | | | | | | |
| Complainant 149 | 1003855 | 22/04/2022 | N/A | N/A | | | | | | | | | |
| Complainant 150 | 1003906 | 27/04/2022 | N/A | 44 | | | | | | | | | |
| Complainant 151 | 1003913 | 28/04/2022 | 43 | 89 | | | X | | | X | X | X | |
| Complainant 152 | 1008267 | 01/05/2022 | 54 | 191 | | X | | | | X | X | X | |
| Complainant 153 | 1004952 | 02/05/2022 | 44 | 52 | | | | | | | | | |
| Complainant 154 | 1004964 | 02/05/2022 | N/A | 23 | | | | X | | | | | X |
| Complainant 155 | 1003792 | 03/05/2022 | N/A | 8 | | | | X | | | | | X |
| Complainant 156 | 1004983 | 03/05/2022 | N/A | N/A | | | | | | | | | |
| Complainant 157 | 1004986 | 03/05/2022 | N/A | 37 | | | | X | | | | | X |
| Complainant 158 | 1005001 | 04/05/2022 | 44 | 77 | | | X | | | X | X | X | |
| Complainant 159 | 1008297 | 06/05/2022 | 49 | 152 | | X | | | | X | X | X | |

| Complainant | Complaint ID | Date of complaint | Days taken for delay notification | Days taken for IDR response | Contravention of s 912A(1)(g) of the Act (cross-referenced to paragraphs of the Concise Statement) | | | | | | | | |
|-----------------|--------------|-------------------|-----------------------------------|-----------------------------|--|------------|------------|------------|------------|------------|----------------|-----------------|--|
| | | | | | Para 11(a) | Para 11(b) | Para 11(c) | Para 12(a) | Para 12(b) | Para 12(c) | Para 16(a)(ii) | Para 16(a)(iii) | |
| Complainant 160 | 1005044 | 09/05/2022 | N/A | 45 | | | | | | | | | |
| Complainant 161 | 1006935 | 10/05/2022 | N/A | 45 | | | | | | | | | |
| Complainant 162 | 1007581 | 10/05/2022 | 29 | 115 | | | X | | | X | X | X | |
| Complainant 163 | 1005607 | 10/05/2022 | 44 | 147 | | | X | | | X | X | X | |
| Complainant 164 | 1007593 | 11/05/2022 | 44 | 83 | | | X | | | X | X | X | |
| Complainant 165 | 1007595 | 11/05/2022 | 44 | 49 | | | | | | | | | |
| Complainant 166 | 1008307 | 16/05/2022 | N/A | 0 | | | | | | | | | |
| Complainant 167 | 1008313 | 17/05/2022 | N/A | 44 | | | | | | | | | |
| Complainant 168 | 1008320 | 17/05/2022 | N/A | 86 | X | | | | | | X | | |
| Complainant 169 | 1008398 | 20/05/2022 | N/A | 42 | | | | | | | | | |
| Complainant 170 | 1008396 | 25/05/2022 | 44 | 15 | | | X | X | | X | X | X | |
| Complainant 171 | 1008390 | 25/05/2022 | 44 | 142 | | | X | | | | X | | |
| Complainant 172 | 1008904 | 30/05/2022 | N/A | 32 | | | | | | | | | |
| Complainant 173 | 1008416 | 31/05/2022 | 45 | 52 | | | X | | | X | X | X | |
| Complainant 174 | 1008919 | 05/06/2022 | N/A | 24 | | | | | | | | | |
| Complainant 175 | 1013735 | 07/06/2022 | N/A | 44 | | | | | | | | | |
| Complainant 176 | 1009612 | 14/06/2022 | N/A | 28 | | | | | | | | | |
| Complainant 177 | 1009614 | 14/06/2022 | N/A | 41 | | | | | | | | | |
| Complainant 178 | 1009618 | 15/06/2022 | 44 | 145 | | | X | | | X | X | X | |
| Complainant 179 | 1009626 | 15/06/2022 | N/A | N/A | | | | | | | | | |
| Complainant 180 | 1009617 | 16/06/2022 | 43 | 172 | | | | | | X | | X | |
| Complainant 181 | 1010226 | 17/06/2022 | N/A | 26 | | | | | | | | | |
| Complainant 182 | 1013554 | 17/06/2022 | N/A | 24 | | | | | | | | | |

| Complainant | Complaint ID | Date of complaint | Days taken for delay notification | Days taken for IDR response | Contravention of s 912A(1)(g) of the Act (cross-referenced to paragraphs of the Concise Statement) | | | | | | | |
|-----------------|--------------|-------------------|-----------------------------------|-----------------------------|--|------------|------------|------------|------------|------------|----------------|-----------------|
| | | | | | Para 11(a) | Para 11(b) | Para 11(c) | Para 12(a) | Para 12(b) | Para 12(c) | Para 16(a)(ii) | Para 16(a)(iii) |
| Complainant 183 | 1009635 | 17/06/2022 | N/A | 88 | X | | | | | | X | |
| Complainant 184 | 1009629 | 17/06/2022 | 45 | 172 | | | X | | | X | X | X |
| Complainant 185 | 1010227 | 20/06/2022 | N/A | 36 | | | | X | | | | X |
| Complainant 186 | 1011540 | 24/06/2022 | N/A | N/A | | | | | | | | |
| Complainant 187 | 1013707 | 26/06/2022 | N/A | 44 | | | | | | | | |
| Complainant 188 | 1012232 | 29/06/2022 | 43 | 61 | | | X | | | X | X | X |
| Complainant 189 | 1012875 | 30/06/2022 | N/A | 47 | X | | | | | | X | |
| Complainant 190 | 1012864 | 30/06/2022 | 43 | 195 | | | X | | | X | X | X |
| Complainant 191 | 1013541 | 01/07/2022 | N/A | N/A | | | | | | | | |
| Complainant 192 | 1013543 | 01/07/2022 | N/A | N/A | | | | | | | | |
| Complainant 193 | 1013549 | 04/07/2022 | N/A | 25 | | | | | | | | |
| Complainant 194 | 1013551 | 04/07/2022 | N/A | N/A | | | | | | | | |
| Complainant 195 | 1013777 | 05/07/2022 | 59 | 129 | | X | | | | X | X | X |
| Complainant 196 | 1013580 | 05/07/2022 | 43 | 120 | | | X | | | X | X | X |
| Complainant 197 | 1013624 | 08/07/2022 | N/A | N/A | | | | | | | | |
| Complainant 198 | 1013685 | 08/07/2022 | N/A | 17 | | | | | | | | |
| Complainant 199 | 1013691 | 12/07/2022 | 44 | 57 | | | X | | | X | X | X |
| Complainant 200 | 1013714 | 14/07/2022 | 46 | 61 | | X | | | | X | X | X |
| Complainant 201 | 1013683 | 14/07/2022 | 43 | 63 | | | X | | | X | X | X |
| Complainant 202 | 1013930 | 15/07/2022 | N/A | 59 | X | | | | | | X | |
| Complainant 203 | 1013904 | 15/07/2022 | N/A | N/A | | | | | | | | |
| Complainant 204 | 1013754 | 15/07/2022 | 41 | 123 | | | X | | | X | X | X |
| Complainant 205 | 1013747 | 17/07/2022 | N/A | 12 | | | | | | | | |

| Complainant | Complaint ID | Date of complaint | Days taken for delay notification | Days taken for IDR response | Contravention of s 912A(1)(g) of the Act (cross-referenced to paragraphs of the Concise Statement) | | | | | | | |
|-----------------|--------------|-------------------|-----------------------------------|-----------------------------|--|------------|------------|------------|------------|------------|----------------|-----------------|
| | | | | | Para 11(a) | Para 11(b) | Para 11(c) | Para 12(a) | Para 12(b) | Para 12(c) | Para 16(a)(ii) | Para 16(a)(iii) |
| Complainant 206 | 1013876 | 18/07/2022 | 53 | 109 | | X | | | | X | X | X |
| Complainant 207 | 1013927 | 20/07/2022 | N/A | 48 | X | | | | | | X | |
| Complainant 208 | 1013802 | 21/07/2022 | 12 | 55 | | | X | | | X | X | X |
| Complainant 209 | 1013824 | 22/07/2022 | 42 | 96 | | | | X | | X | | X |
| Complainant 210 | 1013891 | 26/07/2022 | 45 | 101 | | | X | | | X | X | X |
| Complainant 211 | 1013864 | 26/07/2022 | 44 | 118 | | | X | | | X | X | X |
| Complainant 212 | 1013905 | 27/07/2022 | 44 | 105 | | | | | | X | | X |
| Complainant 213 | 1013929 | 28/07/2022 | 43 | 146 | | | X | | | X | X | X |
| Complainant 214 | 1013994 | 29/07/2022 | N/A | 48 | X | | | | | | X | |
| Complainant 215 | 1013982 | 29/07/2022 | 48 | 115 | | X | | | | X | X | X |
| Complainant 216 | 1013940 | 29/07/2022 | 45 | 59 | | | | | | X | | X |
| Complainant 217 | 1013963 | 31/07/2022 | 45 | 108 | | | X | | | X | X | X |
| Complainant 218 | 1014028 | 03/08/2022 | N/A | 26 | | | | | | | | |
| Complainant 219 | 1014771 | 04/08/2022 | 76 | 169 | | X | | | | X | X | X |
| Complainant 220 | 1014063 | 05/08/2022 | N/A | N/A | | | | | | | | |
| Complainant 221 | 1014344 | 07/08/2022 | 44 | 61 | | | X | | | X | X | X |
| Complainant 222 | 1014260 | 10/08/2022 | N/A | N/A | | | | | | | | |
| Complainant 223 | 1014268 | 10/08/2022 | 49 | 167 | | X | | | | X | X | X |
| Complainant 224 | 1014200 | 11/08/2022 | 41 | 183 | | | | | | X | | X |
| Complainant 225 | 1014254 | 11/08/2022 | N/A | 5 | | | | | | | | |
| Complainant 226 | 1014270 | 14/08/2022 | 30 | N/A | | | | | | | | |
| Complainant 227 | 1014358 | 18/08/2022 | N/A | 41 | | | | | | | | |
| Complainant 228 | 1014370 | 18/08/2022 | 43 | 152 | | | X | | | X | X | X |

| Complainant | Complaint ID | Date of complaint | Days taken for delay notification | Days taken for IDR response | Contravention of s 912A(1)(g) of the Act (cross-referenced to paragraphs of the Concise Statement) | | | | | | | | |
|-----------------|--------------|-------------------|-----------------------------------|-----------------------------|--|------------|------------|------------|------------|------------|----------------|-----------------|---|
| | | | | | Para 11(a) | Para 11(b) | Para 11(c) | Para 12(a) | Para 12(b) | Para 12(c) | Para 16(a)(ii) | Para 16(a)(iii) | |
| Complainant 229 | 1014391 | 18/08/2022 | N/A | N/A | | | | | | | | | |
| Complainant 230 | 1014377 | 19/08/2022 | N/A | 45 | | | | | | | | | |
| Complainant 231 | 1014405 | 21/08/2022 | N/A | 22 | | | | | | | | | |
| Complainant 232 | 1014404 | 22/08/2022 | N/A | N/A | | | | | | | | | |
| Complainant 233 | 1014408 | 22/08/2022 | N/A | N/A | | | | | | | | | |
| Complainant 234 | 1014492 | 22/08/2022 | N/A | 42 | | | | | | | | | |
| Complainant 235 | 1014597 | 23/08/2022 | N/A | 13 | | | | | | | | | |
| Complainant 236 | 1014454 | 24/08/2022 | N/A | 41 | | | | | | | | | |
| Complainant 237 | 1014474 | 24/08/2022 | 44 | 176 | | | X | | | X | X | X | |
| Complainant 238 | 1014522 | 29/08/2022 | N/A | 30 | | | | | | | | | |
| Complainant 239 | 1014552 | 30/08/2022 | 44 | 86 | | | X | | | X | X | X | |
| Complainant 240 | 1014558 | 31/08/2022 | N/A | 43 | | | | X | | | | | X |
| Complainant 241 | 1014576 | 01/09/2022 | N/A | 43 | | | | | | | | | |
| Complainant 242 | 1017595 | 01/09/2022 | 43 | 71 | | | | | | X | | | X |
| Complainant 243 | 1014812 | 05/09/2022 | 44 | 84 | | | X | | | X | X | X | |
| Complainant 244 | 1014954 | 07/09/2022 | N/A | 42 | | | | | | | | | |
| Complainant 245 | 1014927 | 09/09/2022 | 49 | 55 | | X | | | | X | X | X | |
| Complainant 246 | 1014943 | 13/09/2022 | 41 | 153 | | | X | | | X | X | X | |
| Complainant 247 | 1014966 | 13/09/2022 | N/A | 43 | | | | | | | | | |
| Complainant 248 | 1014995 | 14/09/2022 | 43 | 97 | | | | | | | | | |
| Complainant 249 | 1014463 | 18/09/2022 | 17 | 165 | | | X | | | X | X | X | |
| Complainant 250 | 1016845 | 21/09/2022 | 42 | 47 | | | X | | | X | X | X | |
| Complainant 251 | 1016177 | 23/09/2022 | N/A | N/A | | | | | | | | | |

| Complainant | Complaint ID | Date of complaint | Days taken for delay notification | Days taken for IDR response | Contravention of s 912A(1)(g) of the Act (cross-referenced to paragraphs of the Concise Statement) | | | | | | | | |
|-----------------|--------------|-------------------|-----------------------------------|-----------------------------|--|------------|------------|------------|------------|------------|----------------|-----------------|---|
| | | | | | Para 11(a) | Para 11(b) | Para 11(c) | Para 12(a) | Para 12(b) | Para 12(c) | Para 16(a)(ii) | Para 16(a)(iii) | |
| Complainant 252 | 1016179 | 26/09/2022 | N/A | N/A | | | | | | | | | |
| Complainant 253 | 1016826 | 27/09/2022 | N/A | 41 | | | | | | | | | |
| Complainant 254 | 1016856 | 30/09/2022 | N/A | N/A | | | | | | | | | |
| Complainant 255 | 1017497 | 02/10/2022 | N/A | 36 | | | | | | | | | |
| Complainant 256 | 1017538 | 04/10/2022 | N/A | 0 | | | | | | | | | |
| Complainant 257 | 1017592 | 05/10/2022 | 41 | 63 | | | | | | X | | | X |
| Complainant 258 | 1017594 | 05/10/2022 | N/A | 35 | | | | | | | | | |
| Complainant 259 | 1017600 | 06/10/2022 | N/A | 27 | | | | | | | | | |
| Complainant 260 | 1017604 | 06/10/2022 | N/A | 43 | | | | | | | | | |
| Complainant 261 | 1017651 | 06/10/2022 | N/A | 4 | | | | | | | | | |
| Complainant 262 | 1017675 | 10/10/2022 | N/A | 25 | | | | | | | | | |
| Complainant 263 | 1017672 | 11/10/2022 | N/A | 10 | | | | X | | | | | X |
| Complainant 264 | 1024802 | 11/10/2022 | N/A | 38 | | | | | | | | | |
| Complainant 265 | 1017674 | 12/10/2022 | N/A | 2 | | | | | | | | | |
| Complainant 266 | 1017697 | 12/10/2022 | N/A | 28 | | | | | | | | | |
| Complainant 267 | 1018152 | 12/10/2022 | N/A | 33 | | | | | | | | | |
| Complainant 268 | 1018168 | 12/10/2022 | N/A | 44 | | | | | | | | | |
| Complainant 269 | 1018163 | 13/10/2022 | N/A | 41 | | | | | | | | | |
| Complainant 270 | 1018208 | 17/10/2022 | N/A | 25 | | | | | | | | | |
| Complainant 271 | 1018215 | 17/10/2022 | N/A | 31 | | | | X | | | | | X |
| Complainant 272 | 1018222 | 17/10/2022 | N/A | N/A | | | | | | | | | |
| Complainant 273 | 1018836 | 20/10/2022 | N/A | 18 | | | | X | | | | | X |
| Complainant 274 | 1018257 | 21/10/2022 | N/A | 19 | | | | | | | | | |

| Complainant | Complaint ID | Date of complaint | Days taken for delay notification | Days taken for IDR response | Contravention of s 912A(1)(g) of the Act (cross-referenced to paragraphs of the Concise Statement) | | | | | | | | |
|-----------------|--------------|-------------------|-----------------------------------|-----------------------------|--|------------|------------|------------|------------|------------|----------------|-----------------|--|
| | | | | | Para 11(a) | Para 11(b) | Para 11(c) | Para 12(a) | Para 12(b) | Para 12(c) | Para 16(a)(ii) | Para 16(a)(iii) | |
| Complainant 275 | 1018822 | 21/10/2022 | N/A | 26 | | | | | | | | | |
| Complainant 276 | 1018828 | 25/10/2022 | N/A | 36 | | | | | | | | | |
| Complainant 277 | 1020798 | 04/11/2022 | N/A | 42 | | | | | | | | | |
| Complainant 278 | 1029604 | 04/11/2022 | N/A | 40 | | | | | | | | | |
| Complainant 279 | 1021448 | 07/11/2022 | 42 | 116 | | | X | | | X | X | X | |
| Complainant 280 | 1021492 | 07/11/2022 | N/A | 8 | | | | | | | | | |
| Complainant 281 | 1023427 | 14/11/2022 | N/A | 1 | | | | | | | | | |
| Complainant 282 | 1023434 | 14/11/2022 | N/A | N/A | | | | | | | | | |
| Complainant 283 | 1024817 | 15/11/2022 | N/A | 13 | | | | | | | | | |
| Complainant 284 | 1023469 | 16/11/2022 | N/A | N/A | | | | | | | | | |
| Complainant 285 | 1024763 | 16/11/2022 | N/A | 1 | | | | | | | | | |
| Complainant 286 | 1028704 | 16/11/2022 | N/A | 29 | | | | | | | | | |
| Complainant 287 | 1024800 | 17/11/2022 | N/A | 6 | | | | | | | | | |
| Complainant 288 | 1028707 | 17/11/2022 | N/A | 19 | | | | | | | | | |
| Complainant 289 | 1025404 | 18/11/2022 | N/A | 24 | | | | | | | | | |
| Complainant 290 | 1024856 | 21/11/2022 | N/A | 10 | | | | | | | | | |
| Complainant 291 | 1026074 | 23/11/2022 | N/A | 19 | | | | | | | | | |
| Complainant 292 | 1027404 | 24/11/2022 | N/A | 18 | | | | | | | | | |
| Complainant 293 | 1030691 | 24/11/2022 | N/A | 40 | | | | | | | | | |
| Complainant 294 | 1027385 | 29/11/2022 | N/A | 15 | | | | | | | | | |
| Complainant 295 | 1028048 | 30/11/2022 | N/A | 2 | | | | | | | | | |
| Complainant 296 | 1028054 | 01/12/2022 | N/A | 22 | | | | | | | | | |
| Complainant 297 | 1028719 | 03/12/2022 | N/A | 3 | | | | | | | | | |

| Complainant | Complaint ID | Date of complaint | Days taken for delay notification | Days taken for IDR response | Contravention of s 912A(1)(g) of the Act (cross-referenced to paragraphs of the Concise Statement) | | | | | | | | |
|-----------------|--------------|-------------------|-----------------------------------|-----------------------------|--|------------|------------|------------|------------|------------|----------------|-----------------|--|
| | | | | | Para 11(a) | Para 11(b) | Para 11(c) | Para 12(a) | Para 12(b) | Para 12(c) | Para 16(a)(ii) | Para 16(a)(iii) | |
| Complainant 298 | 1028713 | 05/12/2022 | N/A | 3 | | | | | | | | | |
| Complainant 299 | 1029363 | 05/12/2022 | N/A | 39 | | | | | | | | | |
| Complainant 300 | 1029366 | 05/12/2022 | N/A | N/A | | | | | | | | | |
| Complainant 301 | 1034799 | 05/12/2022 | N/A | 17 | | | | | | | | | |
| Complainant 302 | 1029376 | 06/12/2022 | N/A | 6 | | | | | | | | | |
| Complainant 303 | 1029408 | 06/12/2022 | N/A | 7 | | | | | | | | | |
| Complainant 304 | 1029454 | 07/12/2022 | N/A | 2 | | | | | | | | | |
| Complainant 305 | 1029490 | 07/12/2022 | N/A | 2 | | | | | | | | | |
| Complainant 306 | 1029620 | 09/12/2022 | N/A | 13 | | | | | | | | | |
| Complainant 307 | 1029622 | 09/12/2022 | N/A | 5 | | | | | | | | | |
| Complainant 308 | 1029635 | 10/12/2022 | N/A | 33 | | | | | | | | | |
| Complainant 309 | 1029614 | 12/12/2022 | N/A | 43 | | | | | | | | | |
| Complainant 310 | 1029644 | 12/12/2022 | N/A | 4 | | | | | | | | | |
| Complainant 311 | 1029654 | 13/12/2022 | N/A | 36 | | | | | | | | | |
| Complainant 312 | 1030687 | 15/12/2022 | 41 | 84 | | | | | | | | | |
| Complainant 313 | 1032022 | 17/12/2022 | N/A | N/A | | | | | | | | | |
| Complainant 314 | 1031370 | 19/12/2022 | 44 | 56 | | | X | | | X | X | X | |
| Complainant 315 | 1031374 | 19/12/2022 | N/A | 44 | | | | | | | | | |
| Complainant 316 | 1031387 | 19/12/2022 | N/A | 31 | | | | | | | | | |
| Complainant 317 | 1032024 | 19/12/2022 | N/A | 2 | | | | | | | | | |
| Complainant 318 | 1016504 | 20/12/2022 | 64 | 107 | | X | | | | X | X | X | |
| Complainant 319 | 1032010 | 20/12/2022 | 43 | N/A | | | | | | | | | |
| Complainant 320 | 1032014 | 20/12/2022 | N/A | N/A | | | | | | | | | |

| Complainant | Complaint ID | Date of complaint | Days taken for delay notification | Days taken for IDR response | Contravention of s 912A(1)(g) of the Act (cross-referenced to paragraphs of the Concise Statement) | | | | | | | |
|-----------------|--------------|-------------------|-----------------------------------|-----------------------------|--|------------|------------|------------|------------|------------|----------------|-----------------|
| | | | | | Para 11(a) | Para 11(b) | Para 11(c) | Para 12(a) | Para 12(b) | Para 12(c) | Para 16(a)(ii) | Para 16(a)(iii) |
| Complainant 321 | 1032056 | 21/12/2022 | 42 | 65 | | | | | | X | | X |
| Complainant 322 | 1003349 | 22/12/2022 | N/A | 13 | | | | | | | | |
| Complainant 323 | 1003355 | 22/12/2022 | N/A | 21 | | | | | | | | |
| Complainant 324 | 1003960 | 23/12/2022 | N/A | 6 | | | | | | | | |
| Complainant 325 | 1004627 | 30/12/2022 | N/A | 40 | | | | X | | | | X |
| Complainant 326 | 1033330 | 30/12/2022 | N/A | 42 | | | | | | | | |
| Complainant 327 | 1003975 | 02/01/2023 | N/A | 17 | | | | | | | | |
| Complainant 328 | 1004639 | 03/01/2023 | N/A | 41 | | | | | | | | |
| Complainant 329 | 1004629 | 05/01/2023 | N/A | 20 | | | | | | | | |
| Complainant 330 | 1043578 | 06/01/2023 | 116 | 137 | | X | | | | | X | |
| Complainant 331 | 1005282 | 09/01/2023 | N/A | 42 | | | | | | | | |
| Complainant 332 | 1005292 | 10/01/2023 | N/A | N/A | | | | | | | | |
| Complainant 333 | 1007931 | 10/01/2023 | N/A | 44 | | | | | | | | |
| Complainant 334 | 1005290 | 11/01/2023 | N/A | 42 | | | | | | | | |
| Complainant 335 | 1005298 | 12/01/2023 | N/A | 32 | | | | X | | | | X |
| Complainant 336 | 1024856 | 12/01/2023 | N/A | 34 | | | | | | | | |
| Complainant 337 | 1023109 | 13/01/2023 | N/A | 62 | X | | | | | | X | |