



Decision and Reasons for Decision

Citation:	<i>Q56 and Queensland Police Service [2024] QICmr 4 (14 February 2024)</i>
Application Number:	317449
Applicant:	Q56
Respondent:	Queensland Police Service
Decision Date:	14 February 2024
Catchwords:	ADMINISTRATIVE LAW - RIGHT TO INFORMATION - REFUSAL OF ACCESS - CONTRARY TO PUBLIC INTEREST INFORMATION - applicant seeking access to information provided by other individuals to police about an incident involving the applicant - administration of justice for a person - personal information and right to privacy of individuals other than the applicant - whether disclosure of information would, on balance, be contrary to the public interest - section 67(1) of the <i>Information Privacy Act 2009</i> (Qld) and sections 47(3)(b) and 49 of the <i>Right to Information Act 2009</i> (Qld)

REASONS FOR DECISION

Summary

1. The applicant applied¹ to Queensland Police Service (**QPS**) under the *Information Privacy Act 2009* (Qld) (**IP Act**) for information about police attendance at his address regarding an incident of domestic violence.
2. QPS located 13 pages and decided² to disclose 11 pages (in part) and refuse access to 2 pages in full and parts of some of the 11 pages on the ground that disclosure would be, on balance, contrary to the public interest.
3. The applicant applied for internal review of this decision.³ QPS decided to vary its original decision although this did not result in any further information being disclosed.⁴
4. The applicant applied to the Office of the Information Commissioner (**OIC**) for external review of QPS's decision refusing access to certain documents.⁵
5. QPS agreed to release some additional information to the applicant on external review,⁶ and the applicant narrowed the information sought on external review to one

¹ Application compliant on 28 April 2023.

² On 13 June 2023.

³ On 14 June 2023.

⁴ On 12 July 2023.

⁵ On 24 July 2023.

page. For the reasons set out below, I affirm QPS's decision and find that access to the remaining information in issue, on the one page of interest to the applicant, may be refused on the grounds that its disclosure would, on balance, be contrary to the public interest.⁷

Reviewable decision

6. The reviewable decision is QPS's internal review decision on 12 July 2023.

Evidence considered

7. Significant procedural steps relating to the external review are set out in the Appendix.
8. Evidence, submissions, legislation and other material I have considered in reaching this decision are set out in these reasons (including footnotes and the Appendix).
9. I have also had regard to the *Human Rights Act 2019* (Qld) (**HR Act**), particularly the right to recognition and equality before the law and the right to seek and receive information.⁸ I consider a decision-maker will be '*respecting and acting compatibly with*' these rights and others prescribed in the HR Act, when applying the law prescribed in the IP Act and the RTI Act.⁹ I have acted in this way in making this decision, in accordance with section 58(1) of the HR Act. I also note the observations made by Bell J on the interaction between equivalent pieces of Victorian legislation:¹⁰ '*it is perfectly compatible with the scope of that positive right in the Charter for it to be observed by reference to the scheme of, and principles in, the Freedom of Information Act.*'

Background

10. On external review, the applicant narrowed his request to information appearing on one page.¹¹ QPS agreed to disclose further information from this page to the applicant.¹² OIC then expressed a preliminary view to the applicant that access to the remaining information may be refused on public interest grounds. The applicant contested OIC's preliminary view.¹³

Information in issue

11. The information in issue (**Information in Issue**) comprises third party personal information of individuals other than the applicant. Some of this information is intertwined with the personal information of the applicant. It comprises information provided to the attending police officers about a domestic violence incident involving the applicant.

Issue for determination

⁶ On 17 October 2023.

⁷ Section 67(1) of the IP Act and section 47(3)(b) of the RTI Act.

⁸ Sections 15 and 21 of the HR Act.

⁹ *XYZ v Victoria Police (General)* [2010] VCAT 255 (16 March 2010) (**XYZ**) at [573]; *Horrocks v Department of Justice (General)* [2012] VCAT 241 (2 March 2012) at [111]. OIC's approach to the HR Act set out in this paragraph has recently been considered and endorsed by QCAT Judicial Member McGill in *Lawrence v Queensland Police Service* [2022] QCATA 134, noting that he saw '*no reason to differ*' from our position ([23]).

¹⁰ *Freedom of Information Act 1982* (Vic) and the *Charter of Human Rights and Responsibilities Act 2006* (Vic).

¹¹ Page 8 of the located documents.

¹² On 17 October 2023.

¹³ On 31 October 2023.

12. The issue for determination is whether access to the Information in Issue may be refused because its disclosure would, on balance, be contrary to the public interest.

Relevant law

13. Under the IP Act, an individual has a right to be given access to documents of an agency to the extent they comprise the individual's personal information.¹⁴ However, this right is subject to provisions of the IP Act and the *Right to Information Act 2009* (Qld) (**RTI Act**), including the grounds on which an agency may refuse access to documents.¹⁵ An agency may refuse access to information where its disclosure would, on balance, be contrary to the public interest.¹⁶
14. In assessing whether disclosure of information would, on balance, be contrary to the public interest, a decision-maker must:¹⁷
- identify factors irrelevant to the public interest and disregard them
 - identify factors in favour of disclosure of information
 - identify factors in favour of nondisclosure of information; and
 - decide whether, on balance, disclosure of the information would be contrary to the public interest.
15. Schedule 4 of the RTI Act contains non-exhaustive lists of factors that may be relevant in determining where the balance of public interest lies in a particular case. I have considered these lists,¹⁸ together with all other relevant information, in reaching my decision. I have kept in mind the IP Act's pro-disclosure bias¹⁹ and Parliament's requirement that grounds for refusing access to information be interpreted narrowly.²⁰

Findings

Applicant's submissions

16. The applicant made extensive submissions regarding disclosure of the Information in Issue. While I have considered all of the applicant's submissions, I have extracted a key part of his submissions below, which I accept as raising a number of public interest considerations relevant to my decision:²¹

Exception has also been taken to the release of the information which is the "Applicant's personal information" as "a significant amount of your personal information is inexplicably [sic] intertwined with the personal information of people other than yourself..." The only other possible personal information could be that relating to [identified individual]. None of the redactions on page 8 could possibly disclose any personal information of [identified

¹⁴ Section 40 of the IP Act.

¹⁵ Section 67(1) of the IP Act provides that an agency may refuse access to a document in the same way and to the same extent it could refuse access to the document under section 47 of the RTI Act were the document to be the subject of an access application under the RTI Act.

¹⁶ Section 67(1) of the IP Act and 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, or a substantial segment, of the community, as distinct from matters that concern purely private or personal interests. However, there are some recognised public interest considerations that may apply for the benefit of an individual. See Chris Wheeler, 'The Public Interest: We Know It's Important, But Do We Know What It Means' (2006) 48 AIAL Forum 12, 14.

¹⁷ Section 49(3) of the RTI Act.

¹⁸ I have considered each of the public interest factors outlined in schedule 4 of the RTI Act, and any relevant factors are discussed below (in relation to each category of documents).

¹⁹ Section 64 of the IP Act.

²⁰ Section 67(2) of the IP Act and section 47(2) of the RTI Act. In deciding whether disclosure of the Information in Issue would, on balance, be contrary to the public interest, I have taken no irrelevant factors into account in making my decision.

²¹ By email on 23 July 2023 and 31 October 2023.

individual] and the fact that they are inexplicably [sic] intertwined, does not preclude disclosure.²²

Personal information and privacy

6. The 'right of an individual to preserve their personal sphere free from interference from others' is a phrase extracted from the decision in *Marshall and Department of Police*.²³ Accepting (for the moment) that this definition is applicable (although it doesn't seem to apply to this particular scenario) the applicant has a right to preserve their personal sphere free from the interference of others. No other person can be compromised by the release of the information. What is said to the police about another person might be a falsity – it might possibly amount to a defamation.

7. Any personal information that relates to [identified individual] is properly not disclosed: conversely, any information or comments made to the police should be unmasked insofar as they concern the Applicant.

8. If the information is about me – it is my personal information – defined by section s12 of the IPA. What is said about me (whether it is true or not) is my personal information.

9. Moreover the 'personal information' exemption under s6 of the IPA must (in addition to being personal information) must be information 'which could reasonably be expected to cause a public interest harm'.

10. Neither the original decision nor the later decision maker has considered 'public interest harm'. That is perhaps because in this case - there is none.

Prejudice flow of information to police

11. This is a case where there has been information conveyed to the police which varies substantially from the information provided by the Applicant. In *Marshall's* case it was said in the passage following the passage following that relied upon by the decision maker:

"[19]... there may be circumstances in which disclosure of information... may advance this particular public interest – such as, for example, where there is a clear discrepancy between evidence given orally and subsequently recorded, or some other objective material suggesting that an individual's account has been incorrectly or inaccurately recorded, or is itself a manifest fabrication..."

12. It is recorded at page 8 of the documents disclosed that:
[redacted]

13. The non-disclosure of this information cannot in these circumstances "be expected to discourage the sharing of information and cooperation with the police."

.....

I have also filed proceedings in the Supreme court of Queensland – a fact distinguishing this matter from that of the case upon which reliance is placed – *Marshall*.

My position in relation to the balance of the report is unchanged. I don't actually accept that it can in any way be considered in the public interest to protect 'private' information about myself (disregarding any entitlement I might have to procedural fairness/natural justice). I do understand that there needs to be a balance struck – and the difficulties attendant that exercise of discretion.

There are 2 additional points that might be made.

²² 'Re KBN and Department of Families, Youth and Community Care (1998) 4 QAR 422 at paragraphs 22FF' [sic].

²³ '(unreported, Queensland Information Commissioner, 25 February 2011) [27]' [sic].

Firstly the principal basis upon which the decision is being made appears to be that “People interacting with QPS in the context of a domestic violence complaint are entitled to expect that information they provide will only be used for the purpose of an investigation and will not be disclosed to the other party unless necessary....[various exceptions are then cited]”

One exception to this principle is that there must be ‘procedural fairness’. The investigation has concluded – and the information provided concerns myself.

Procedural fairness and natural justice considerations would therefore weigh in favour of the information being disclosed.

Which leads to the second point – the personal information of the aggrieved (and her right to privacy) in this case appears to be elevated – above my right to privacy? I’m not sure how that is being reconciled? Why is it that a person making a complaint about another person (and for the sake of the argument assume that the other person is going about their everyday business) – has a superior right to privacy than the person who is oblivious to it all??

[sic]

Public Interest Consideration

17. The RTI Act requires a decision-maker to identify and disregard any factors that are irrelevant to deciding whether disclosure of the Information in Issue would, on balance, be contrary to the public interest.²⁴ I have not identified any irrelevant factors in this matter.

Factors favouring disclosure

18. In considering the balance of the public interest, I have first considered the public interest factors favouring disclosure of the Information in Issue, in addition to the pro-disclosure bias. Some of the Information in Issue is about the applicant and comprises his personal information.²⁵ This gives rise to a factor favouring disclosure as noted in the applicant’s submissions.²⁶ There is a strong public interest in individuals receiving access to their personal information held by government and I afford this factor significant weight, to the extent the information is about the applicant. However, the applicant’s personal information appears in an intertwined way with the personal information of other individuals and cannot be severed or extracted. Disclosing it would therefore disclose the personal information of other individuals, raising two factors favouring nondisclosure of the Information in Issue (considered below).
19. I have considered whether disclosing the Information in Issue could reasonably be expected²⁷ to promote QPS accountability and transparency by allowing scrutiny of police handling of the alleged incident.²⁸ I consider these factors are relevant in this case. In determining the weight applicable to these factors, the documents show QPS decided to take no further action in response to the complaint and the applicant was not charged with any offence. The information released to the applicant shows the steps officers took in responding to the alleged incident and the view they reached

²⁴ Section 49(3)(a) and schedule 4, part 1 of the RTI Act. I note the lists of factors provided in schedule 4 are non-exhaustive.

²⁵ *Personal information* is defined in section 12 of the IP Act as ‘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’.

²⁶ Schedule 4, part 2, item 7 of the RTI Act.

²⁷ The words ‘could reasonably be expected’ are to be given their ordinary meaning and the relevant expectation must be reasonably based and not irrational, absurd or ridiculous: see *Attorney-General’s Department v Cockroft* (1986) 64 ALR 97, per Bowen CJ and Beaumont J at 106. Previous decisions of the Information Commissioner have established that a mere possibility is not sufficient to show that a particular consequence could reasonably be expected: see *Murphy and Treasury Department* (1995) 2 QAR 744 at [44], citing *Re B and Brisbane North Regional Health Authority* (1994) 1 QAR 279 at [160].

²⁸ Schedule 4, part 2, items 1, 3 and 11 of the RTI Act.

based on the versions of events they obtained. While disclosing the Information in Issue to the applicant would provide him with a greater understanding of the information QPS received, it would not advance the public interest factors relevant to the accountability of QPS, in this matter, in any meaningful way. Accordingly, I afford these factors low weight.

20. The applicant has submitted the Information in Issue '*might be a falsity – it might possibly amount to a defamation.*²⁹ I have considered whether disclosure could reasonably be expected to reveal that the information was incorrect, out of date, misleading, gratuitous, unfairly subjective or irrelevant.³⁰ There is no information before me to suggest that QPS officers incorrectly recorded the information which they received or that any other part of this factor is relevant.³¹
21. The inherent subjectivity in information provided to police in these matters does not mean that the resulting account or statement is necessarily incorrect or a '*falsity*' as the applicant suggests; it is simply a record of the information provided at the time. In this case, the information was provided by individuals to police for consideration during a police call-out relating to domestic violence, and I accept that this type of information, and the circumstances in which it was provided, are often contested by individuals involved. However, I am satisfied the disclosure of this information to the applicant is not likely, in itself, to reveal that the information was incorrect, out of date, misleading, gratuitous, unfairly subjective or irrelevant.³² Accordingly, I have not given any weight to this factor in favour of disclosure.
22. The applicant has also submitted that he requires the information as he is pursuing action against an involved party. I have considered whether disclosure of the Information in Issue could reasonably be expected to contribute to the administration of justice for a person or generally, or advance the fair treatment of the applicant.³³
23. In *Willsford and Brisbane City Council*³⁴ the Information Commissioner held that the administration of justice factor for a person will arise if an applicant can demonstrate that:
 - they have suffered loss or damage or some kind of wrong, in respect of which a remedy is, or may be available under the law
 - they have a reasonable basis for seeking to pursue the remedy; and
 - disclosing the information would assist the applicant to pursue the remedy, or to evaluate whether a remedy is available or worth pursuing.³⁵
24. As previously held by the Information Commissioner, complaint 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.³⁶ This inherent subjectivity does not necessarily mean that the resulting account or statement is defamatory or false.³⁷ Rather, it means that complaint information comprises a personal interpretation of relevant events, which must be balanced against other (often

²⁹ In his external review application received on 23 July 2023.

³⁰ Schedule 4, part 2, item 12 of the RTI Act.

³¹ *Marshall and Department of Police* (Unreported, Queensland Information Commissioner, 25 February 2011) at [17]-[20] (*Marshall*).

³² Schedule 4, part 2, item 12 of the RTI Act.

³³ Schedule 4, part 2, items 17, 16 and 10 of the RTI Act.

³⁴ (1996) 3 QAR 368 (*Willsford*).

³⁵ *Willsford* at [17].

³⁶ *Mathews and Gold Coast City Council* (Unreported, Queensland Information Commissioner, 23 June 2011) at [17] - [18].

³⁷ *6XY7LE and child of 6XY7LE and Department of Education, Training and Employment* [2014] QICmr 1 (15 January 2014) at [22].

contradicting) statements and evidence in deciding whether to take further action on a complaint. Further, a decision taking no further action on a complaint or report to police does not mean that the complaint was assessed to be false.

25. In this matter, the QPS officers confirmed a verbal argument had occurred and this was a first occurrence.³⁸ No further action was taken by QPS. I am unable to identify any loss, damage or wrong the applicant experienced because of the complaint to police about his alleged conduct, in respect of which a legal remedy may be available. I have confirmed the applicant has lodged Supreme Court proceedings against the other party but this fact, of itself, does not mean the applicant has a reasonable basis for pursuing this action.³⁹ The applicant bears the onus of satisfying these three requirements and has not provided submissions or evidence establishing the loss, damage or wrong he has suffered, nor the reasonable basis for pursuing the remedy (if the Supreme Court proceedings are the remedy he is claiming). I am satisfied this factor is not enlivened in the circumstances.⁴⁰
26. The applicant has also provided submissions regarding general procedural fairness. Accordingly, I have considered whether disclosure of the Information in Issue could reasonably be expected to contribute to the administration of justice generally, including procedural fairness and contribute to the fair treatment of individuals in accordance with the law in their dealings with agencies.⁴¹
27. The Information Commissioner has previously held⁴² that the *‘fundamental requirements of procedural fairness’*⁴³—that is, *an unbiased decision-maker and a fair hearing—should be afforded to a person who is the subject of an investigation or decision.*⁴⁴ The documents in this matter confirm that no action was taken against the applicant, nor was he subject to an investigation. Rather the police attended his residence following an emergency call from another party and obtained versions of the events from the applicant and other individuals. The applicant has not detailed how disclosure of the Information in Issue could reasonably be expected to contribute to his fair treatment or procedural fairness in these circumstances. As such, I am not satisfied that these two factors apply to the Information in Issue.
28. Having considered the remainder of Schedule 4 of the RTI Act and the applicant’s submissions, I have not identified any further factors favouring disclosure of the Information in Issue.⁴⁵

Factors favouring nondisclosure

29. The Information in Issue comprises the personal information of two other individuals in relation to a domestic violence incident. The RTI Act recognises that:

³⁸ Per page 8 of the disclosed documents.

³⁹ Confirmed by searching the applicant’s name in the Queensland Court ‘eCourts’ online database < <https://www.courts.qld.gov.au/services/search-for-a-court-file/search-civil-files-ecourts> >.

⁴⁰ Schedule 4, part 2, item 17 of the RTI Act.

⁴¹ Schedule 4, part 2, items 16 and 10 of the RTI Act.

⁴² *E41 and Queensland Police Service* [2022] QICmr 13 (17 March 2022) at [23] (**E41**).

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

⁴⁴ The fair hearing aspect of procedural fairness requires that, before a decision that will deprive a person of some right, interest or legitimate expectation is made, the person is entitled to know the case against them and to be given the opportunity of replying

to it (*Kioa v West* (1985) 159 CLR 550 at [584] per Mason J).

⁴⁵ For example disclosure of the Information in Issue could not reasonably be expected to ensure effective oversight of expenditure of public funds, contribute to the protection of the environment or reveal environmental or health risks (schedule 4, part 2, items 4, 13 and 14 of the RTI Act).

- a factor favouring nondisclosure will arise where disclosing the information could reasonably be expected to prejudice the protection of an individual's right to privacy;⁴⁶ and
 - disclosing the information could reasonably be expected to cause a public interest harm if it would disclose personal information of another person.⁴⁷
30. The applicant's personal information is interwoven with the personal information of the other individuals. Given the nature of this information, the applicant's personal information cannot be isolated from the personal information of other individuals.
31. The information was obtained in the context of an alleged domestic violence incident and, in this context, is highly personal and sensitive in nature. I consider it is the type of information which those individuals are entitled to keep private. Parliament has confirmed that if this factor applies, it will reasonably be expected to cause a public interest harm.⁴⁸ The weight of this factor, as with the other factors, will depend on the circumstances and merits of each matter. I am satisfied the extent of the public interest harm in these circumstances would reasonably be expected to be significant. Disclosure under the IP Act would be an unwarranted and significant intrusion into the privacy of those individuals and the extent of the public interest harm that could be anticipated from disclosure is significant.
32. The applicant's knowledge of the identities of the other individuals does not reduce the weight of these nondisclosure factors to any significant degree, especially as the IP Act does not have protections or controls on the dissemination of documents once released in this process.⁴⁹ The applicant has asked why the personal information and right to privacy of other individuals *'appears to be elevated above [his] right to privacy.'*⁵⁰ Relevantly, in the IP Act Parliament has given individuals the right to access their own personal information held by government – not the personal information of other individuals.⁵¹ Both the IP Act and RTI Act require government to make particular efforts to protect an individual's personal information and right to privacy. A decision-maker will always need to decide a matter on its own merits. In this matter, the weight of the public interest in protecting the personal information of the other individuals referred to in the Information in Issue is equally as strong as the public interest in the applicant accessing his own personal information. However a further nondisclosure factor arises in these circumstances because of the prejudice to the right to privacy of other individuals that could reasonably be expected to arise from disclosure of the Information in Issue. This factor does not arise as a disclosure factor, because the applicant cannot prejudice his *'right to privacy'*⁵² when accessing his personal information. In the circumstances I afford both public interest factors favouring nondisclosure significant weight.
33. The Information in Issue was provided to QPS, freely and voluntarily by the other individuals. I consider that disclosing the information could reasonably be expected to prejudice the flow of information to police which gives rise to another factor favouring nondisclosure.⁵³
34. Efficient and effective use of policing resources is facilitated by police being able to seek and obtain information from various members of the community, including

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

⁴⁷ Schedule 4, part 4, section 6 of the RTI Act.

⁴⁸ Section 49(4) and schedule 4, part 4 of the RTI Act.

⁴⁹ *E41* at [27].

⁵⁰ Submissions received on 31 October 2023.

⁵¹ Section 40(1) of the IP Act.

⁵² Submissions received on 31 October 2023.

⁵³ Schedule 4, part 3, item 13 of the RTI Act.

complainants, bystanders, informers and even the subjects of a complaint, with as much cooperation as possible. This is particularly important in domestic violence matters. QPS relies heavily on information from the public to be alerted to and to pursue breaches of the law and there is a very strong public interest in protecting the free flow of information to law enforcement agencies, even where this may result in an agency investigating false and/or unsubstantiated allegations.⁵⁴

35. People interacting with QPS in the context of a domestic violence complaint are entitled to expect that information they provide will only be used for the purpose of an investigation and will not be disclosed to the other party unless necessary for their safety or in the context of subsequent legal proceedings. I consider that giving access to this information under the RTI Act, and outside of any investigation or trial process, would mean that individuals involved in domestic violence incidents would be less likely to provide that information to police in the future. This would, in turn, significantly prejudice QPS's ability to effectively discharge its functions in enforcing the law.
36. The fact that the applicant may disagree with information provided to QPS or believe it is inconsistent with the applicant's version of events or is a falsity or defamatory, does not, in this case, reduce the weight of this public interest factor. In investigating police matters, it is not unusual for QPS officers to receive information which can be inconsistent with information provided by other individuals. It is the investigator's role to evaluate the different versions of events provided to determine whether further action is warranted. In this case, the fact that no further action about the complaint was taken by the police does not reduce the weight of this factor. For these reasons, I afford this factor significant weight favouring nondisclosure in the circumstances.

Balancing the public interest

37. I have applied the pro-disclosure bias intended by Parliament and note the significant weight of the public interest favouring disclosure of the Information in Issue to the extent the information is the applicant's personal information.⁵⁵ I also note the low weight favouring disclosure to promote QPS accountability and transparency.⁵⁶
38. Against this, I note the significant weight favouring nondisclosure of the Information in Issue to protect and safeguard the right to privacy and personal information of other individuals, and to prevent prejudice to the flow of information to QPS.⁵⁷
39. On balance, I am satisfied that the nondisclosure factors significantly outweigh the disclosure factors. Accordingly I find that QPS is entitled to refuse access to the Information in Issue, as disclosure would be, on balance contrary to the public interest.

DECISION

40. I affirm QPS's decision and find that access to the Information in Issue may be refused under section 47(3)(b) of the RTI Act as its disclosure would, on balance, be contrary to the public interest.
41. I have made this decision as a delegate of the Information Commissioner, under section 139 of the IP Act.

⁵⁴ *Gregory and Queensland Police Service* [2014] QICmr 48 (21 November 2014) at [25], *SW5Z7D and Queensland Police Service* [2016] QICmr 1 (15 January 2016) at [30].

⁵⁵ Schedule 4, part 2, item 7 of the RTI Act.

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

⁵⁷ Schedule 4, part 3, item 3; schedule 4, part 4, section 6; and schedule 4, part 3, item 13 of the RTI Act.

S Martin
Acting Right to Information Commissioner

Date: 14 February 2024

APPENDIX**Significant procedural steps**

Date	Event
24 July 2023	OIC received the application for external review. OIC requested procedural documents from QPS.
26 July 2023	OIC received the procedural documents from QPS.
4 August 2023	OIC notified the applicant and QPS that the external review application had been accepted and asked QPS to provide a copy of the information in issue.
4 August 2023	OIC received a response from the applicant confirming the scope of the external review.
9 August 2023	OIC received the information in issue from QPS.
27 September 2023	OIC issued a preliminary view to the applicant.
5 October 2023	OIC received correspondence from the applicant.
6 October 2023	OIC received correspondence from QPS.
10 October 2023	OIC received correspondence from the applicant. OIC confirmed with QPS it would disclose further information to the applicant by 17 October 2023.
17 October 2023	QPS disclosed further information to the applicant
31 October 2023	OIC received submissions from the applicant contesting OIC's preliminary view.