



## Decision and Reasons for Decision

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Citation:	<b>82PNLR and Queensland Police Service [2019] QICmr 21 (13 June 2019)</b>
Application Number:	<b>314010</b>
Applicant:	<b>82PNLR</b>
Respondent:	<b>Queensland Police Service</b>
Decision Date:	<b>13 June 2019</b>
Catchwords:	<b>ADMINISTRATIVE LAW – RIGHT TO INFORMATION – REFUSAL OF ACCESS – CONTRARY TO PUBLIC INTEREST INFORMATION – police body-worn camera footage – accountability and transparency – personal information and privacy – whether disclosure would, on balance, be contrary to the public interest – section 67(1) of the <i>Information Privacy Act 2009</i> (Qld) and section 47(3)(b) and 49 of the <i>Right to Information Act 2009</i> (Qld)</b>

## REASONS FOR DECISION

### Summary

1. The applicant applied<sup>1</sup> to Queensland Police Service (**QPS**) for access under the *Information Privacy Act 2009* (Qld) (**IP Act**) to police body-worn camera (**BWC**) footage of QPS officers dealing with the applicant's child.
2. QPS located two BWC recordings (**Recordings**):
  - 'Part 1', an 11 minute, 21 second recording; and
  - 'Part 2', a 3 minute, 16 second recording.
3. QPS decided<sup>2</sup> to disclose edited versions of each to the applicant, refusing access to parts<sup>3</sup> on the ground their disclosure would, on balance, be contrary to the public interest.
4. The applicant applied<sup>4</sup> to the Office of the Information Commissioner (**OIC**) for external review of QPS's decision to refuse access to parts of the Recordings. As noted below, additional parts of each Recording were disclosed to the applicant during the course of the review.
5. There remains, however, parts of each Recording to which access continues to be refused. For the reasons set out below, I affirm QPS's decision and find that access to those parts may be refused under section 67(1) of the IP Act and section 47(3)(b) of the

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<sup>1</sup> Application dated 27 September 2017.

<sup>2</sup> Decision dated 2 January 2018.

<sup>3</sup> Entire segments of footage were 'cut' from Part 1. Some audio was 'muted out' of Part 2, and the visual component toward the end 'blurred' or pixelated.

<sup>4</sup> Application received on 29 June 2018. OIC decided to accept the application out of time by letter dated 20 December 2018.

*Right to Information Act 2009 (Qld) (RTI Act)*, on the basis that disclosure would, on balance, be contrary to the public interest.

## Background

6. Significant procedural steps are set out in the Appendix.

## Reviewable decision

7. The decision under review is QPS's decision dated 2 January 2018, refusing access to parts of the Recordings.

## Evidence considered

8. Evidence, submissions, legislation and other material considered in reaching this decision are referred to in these reasons (including footnotes and Appendix).

## Information in issue

9. QPS decided to release segments of each Recording to the applicant, and agreed to the disclosure of additional parts of each during the course of OIC's external review – including all video in Part 1, and additional audio in both.
10. The '**Information in Issue**' therefore comprises those parts of each Recording to which QPS continues to refuse access – some audio throughout each, and a portion of pixelated or 'blurred' video footage toward the end of Part 2. Copies of each Recording, edited accordingly, were forwarded to QPS by OIC on 1 April 2019.

## Issues for determination

11. The principal issue for determination is whether disclosure of the Information in Issue would, on balance, be contrary to the public interest.
12. Prior to addressing that issue, however, it is necessary to deal with submissions made by the applicant during the review questioning whether QPS located the full, original versions of the Recordings (and provided same to OIC for consideration).
13. The applicant expressed concern that the 'double-beeps' featured in those parts of each Recording to which he has been given access indicated that there should exist additional footage, which QPS had failed to locate and supply to OIC. These 'beeps' are, essentially, time markers, sounding at regular intervals during recording. In original submissions on this issue, the applicant argued:

*Based on manufacturer specifications, it is **IMPOSSIBLE** for the original recording referred to as 'Part 2' to only be 3m16s in total length as the OIC have stated. It is also **IMPOSSIBLE** that the original recording referred to as 'Part 1' to only be 11m21s in total length as the OIC have stated. ...*

*... the device emits two beeps every 2 minutes during a recording event. In 'Part 2' these beeps can be heard 14s into the recording, indicating that the recording started at least 1m46s prior or multiples of 2 minutes greater than that. For consistency the 2 beeps are also heard at 2m14s into the recording, 2 minutes after the first 2 beeps. Therefore the original recording must be longer than what has been provided and has either been deleted in part...or simply the OIC has been provided an edited version which was claimed to be the actual 'original' recording.*

14. I addressed this contention in my letter to the applicant dated 29 January 2019. Nevertheless, he agitated the issue again in correspondence late in the review, stating that he was of *'the strong belief that the Part 2 video is missing 16 seconds of its video only pre-recording...'*<sup>5</sup>
15. Having carefully considered the recordings, and relevant operational literature pertaining to the 'Axon'-make body-worn cameras used to generate those recordings, I see no basis for suspecting that the originals of the recordings supplied by QPS to OIC are incomplete.
16. The Axon Flex system used by QPS has two operating modes - **'Buffering'** and **'Event'**. In summary terms, 'Buffering' comprises preliminary 'video-only' recording. 'Event' mode comprises full recording, ie, both video and sound.<sup>6</sup>
17. For the purposes of these reasons, it is sufficient to note that full 'Event' recording is preceded by the 'pre-event' Buffering phase of up to 30 seconds, during which, as noted, video only is captured. When full Event recording is activated, the device emits a double-beep, which is then repeated every two minutes for the duration of Event recording. The activation of Event recording also causes the device to save up to 30 seconds of whatever 'pre-Event' 'buffering' video was filmed immediately prior to Event recording.
18. In the present case, the unedited Part 1 recording begins with a full 30-second buffer of video-only footage. Two beeps can then be heard at the commencement of Event recording – audio and video – and then a further two beeps every two minutes thereafter for the duration of the recording.<sup>7</sup>
19. The Part 2 recording has a 14-second buffer, indicating, as I understand, operator initiation of full Event recording *prior* to the passage of the standard 30 seconds of buffering. The two beeps heard at the 14 second mark of Part 2 are, therefore, beeps signalling the commencement of full Event (ie, video and audio) recording.<sup>8</sup>
20. In short, the 'beeps' in each recording are consistent with the Axon manual discussed above, and do not of themselves give cause for suspecting the existence of any additional footage.
21. Before turning to the substantive issue to be determined, I also note the applicant's 14 November 2018 submission stating that he was *'not seeking audio/video of...an officer stating his name. I am simply seeking the names, or confirmation of the names of the officers involved in the filming...'*
22. I addressed this request in my letter to the applicant dated 29 January 2019. He has not further raised it during the review. For the sake of completeness, it is, however, prudent that I re-state in these reasons what I said in that letter.
23. Firstly, the applicant's access application is only expressed to request access to BWC footage, not to any other documents. It is not open to an applicant to unilaterally expand the terms of an access application on external review,<sup>9</sup> and my jurisdiction in this review is limited to considering questions of access to the Recordings only.
24. Additionally, even if it was open to the applicant to now seek access to additional information, his request for names as set out above essentially amounts to a request for

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<sup>5</sup> Email dated 10 May 2019.

<sup>6</sup> Each mode is fully explained here: <<https://help.axon.com/hc/en-us/articles/221367408-Operating-modes>>.

<sup>7</sup> The beeps in the edited version of Part 1 released to the applicant by QPS pursuant to its decision correspond with the beeps at 10 minutes 30 seconds of the original, unedited recording.

<sup>8</sup> And not 'follow up' or 'prompt' beeps indicating that event recording had already been in progress for two minutes.

<sup>9</sup> *Robbins and Brisbane North Regional Health Authority* (1994) 2 QAR 30, paragraph 17.

an answer to a question. The IP Act does not grant a right to obtain answers to questions asked of government agencies, or even to have government agencies extract answers to questions from documents in their possession. The legally enforceable right conferred by section 40 of the IP Act is a right to be given access under the Act, and subject to the Act, to documents of an agency.<sup>10</sup>

25. In view of the above, I cannot in this decision assist the applicant in relation to the issue of names, an inquiry that would need to be directed to QPS.
26. I turn now to consider whether access to the Information in Issue may be refused.

### Relevant law

27. The RTI Act gives people a right to access documents of government agencies such as QPS.<sup>11</sup> This right is subject to other provisions of the RTI Act, including grounds on which access may be refused. Access may be refused to information the disclosure of which would, on balance, be contrary to the public interest.<sup>12</sup>
28. In deciding whether disclosure would, on balance, be contrary to the public interest, the RTI Act requires a decision-maker to:<sup>13</sup>
- identify any irrelevant factors and disregard them
  - identify relevant public interest factors favouring disclosure and nondisclosure
  - balance the relevant factors favouring disclosure and nondisclosure; and
  - decide whether disclosure of the information in issue would, on balance, be contrary to the public interest.
29. Schedule 4 of the RTI Act contains non-exhaustive lists of factors that may be relevant in determining where the balance of the public interest lies in a particular case. I have carefully considered these lists, together with the decision under review, the Information in Issue, and the applicant's submissions, in reaching my decision. Additionally, I have kept in mind the IP Act's pro-disclosure bias<sup>14</sup> and Parliament's requirement that grounds for refusing access to information be interpreted narrowly,<sup>15</sup> and have not taken into account any irrelevant factors.

### Findings

#### *Factors favouring disclosure*

30. I acknowledge the public interest in furthering access to government-held information,<sup>16</sup> and disclosing information which may enhance the transparency of QPS operations, and the accountability of QPS officers for the manner in which they discharge their duties.<sup>17</sup> The footage that has been released to the applicant, however, satisfies these considerations to a considerable extent, reducing the weight to be accorded each in balancing the public interest. I afford each only modest weight.

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<sup>10</sup> *Hearl and Mulgrave Shire Council* (1994) 1 QAR 557 (at paragraph 30).

<sup>11</sup> Section 23 of the RTI Act.

<sup>12</sup> Section 47(3)(b) of the RTI Act. The term '*public interest*' refers to considerations affecting the good order and functioning of the community and government affairs for the well-being of citizens. This means that, in general, a public interest consideration is one which is common to all members of, or a substantial segment of, the community, as distinct from matters that concern purely private or personal interests.

<sup>13</sup> Section 49 of the RTI Act.

<sup>14</sup> Section 64 of the IP Act.

<sup>15</sup> Section 67(2) of the IP Act.

<sup>16</sup> Implicit, for example, in the preamble to the RTI Act.

<sup>17</sup> Schedule 4, part 2, item 1 of the RTI Act.

31. I also acknowledge the public interest in disclosing to an individual their own personal information,<sup>18</sup> which has some limited application in this case, given portions of the Information in Issue feature the applicant. As was explained to the applicant during the course of the review, this information is, however, intertwined with the child's personal information – it is not possible to disclose to him his personal information, without disclosing that of the child's, which would thus occasion the adverse public interest outcomes discussed further below. This consideration therefore also warrants modest weight.
32. The applicant also submits that disclosure of the Information in Issue would disclose:<sup>19</sup>
- ...evidence of unlawful conduct by the very agency that is refusing to release the information. It is highly probable that this refusal of the QPS is solely to prevent itself from being held accountable for the unlawful actions. I note that QPS has already refused to release the information when they required to do so under the disclosure laws of the criminal code.*
- Clearly it is in the public interest for unlawful acts of those in positions of public trust to be made public.*
33. In submissions<sup>20</sup> requesting that OIC extend the time for making an application for external review, the applicant also stated that QPS was the '*defendant in civil actions commenced by me in which this interaction and the recording of is material evidence*'.
34. Factors favouring disclosure of information will arise where disclosure of information could reasonably be expected<sup>21</sup> to:
- allow or assist inquiry into possible deficiencies in the conduct or administration of an agency or official,<sup>22</sup>
  - reveal or substantiate that an agency or official has engaged in misconduct or negligent, improper or unlawful conduct,<sup>23</sup> and/or
  - advance the fair treatment of individuals, and/or contribute to the administration of justice.<sup>24</sup>
35. Apart from the applicant's assertions, there is nothing in the Information in Issue or otherwise before me suggesting any deficient or unlawful conduct by QPS or any other public officers, nor seeming to evidence any unfairness or actionable wrong,<sup>25</sup> disclosure of which might advance fair treatment or aid in the administration of justice. It must be remembered that the applicant has had access to the bulk of the Recordings. The applicant has not, however, pointed to any part of those Recordings – which, objectively assessed, appear to depict relatively routine and professionally-discharged policing activity – which might tend to substantiate the assertions set out above.<sup>26</sup>

<sup>18</sup> Schedule 4, part 2, item 7 of the RTI Act. The definition of '*personal information*' is set out in paragraph 38.

<sup>19</sup> Email dated 7 May 2019.

<sup>20</sup> Email dated 14 November 2018.

<sup>21</sup> The words '*could reasonably be expected to*' call for a decision-maker to discriminate between unreasonable expectations and reasonable expectations, between what is merely possible (eg merely speculative/conjectural '*expectations*') and expectations which are reasonably based, ie, expectations for the occurrence of which real and substantial grounds exist: *B and Brisbane North Regional Health Authority* (1994) 1 QAR 279 at [155] to [160].

<sup>22</sup> Schedule 4, part 2, item 5 of the RTI Act.

<sup>23</sup> Schedule 4, part 2, item 6 of the RTI Act.

<sup>24</sup> Schedule 4, part 2, items 10, 16 and 17 of the RTI Act.

<sup>25</sup> A prerequisite generally necessary to enliven administration of justice considerations: *Willsford and Brisbane City Council* (1996) 3 QAR 368.

<sup>26</sup> While QPS bears the formal onus in this review (section 100 of the IP Act), I consider that a practical onus falls to a person in the applicant's position to put forward some probative material supporting a reasonable expectation that disclosure of information could have public interest outcomes of the kind stated at paragraph 34.

36. In the circumstances, I am not persuaded that disclosure of the parts of the Recordings that have been withheld from the applicant would advance any of the public interest factors favouring consideration listed in paragraph 34. I do not, therefore, accept that relevant factors have any application in this case.<sup>27</sup>
37. Additionally and in any event, even if I were wrong in the findings expressed immediately above – and one or more of the factors identified at paragraph 34 could be said to apply in this case – I am nevertheless of the view that factors favouring nondisclosure as analysed below are of sufficient gravity to tip the balance of the public interest in this case in favour of nondisclosure.<sup>28</sup>

### **Factors favouring nondisclosure**

#### **Personal information – public interest harm**

38. The RTI Act provides that disclosure of information could reasonably be expected to cause a public interest harm if disclosure would disclose personal information of a person, whether living or dead.<sup>29</sup> '*Personal information*' is information 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.<sup>30</sup>
39. I am satisfied that the Information in Issue – recordings of the applicant's child's image, and voice, identifying particulars, and of emergency service personnel discussing the child, the child's welfare, and what ought be done about these matters – is the personal information of a person other than the applicant: it is, relevantly, information about the child, whose identity is apparent or can reasonably be ascertained from the information. Release of the bulk of the Information in Issue would 'disclose'<sup>31</sup> this information for the purposes of schedule 4, part 4, section 6 of the RTI Act, resulting in a public interest harm.
40. Given the child's age, the circumstances in which the personal information was recorded, and the nature of some of that personal information – audio-visual recordings, which disclose both 'lexical' and 'non-lexical' information<sup>32</sup> – my view is that the public interest harm that could reasonably be expected to result from unconditional disclosure of this

<sup>27</sup> Noting, for the sake of completeness, that having carefully considered both the list of factors favouring disclosure in schedule 4, part 2 of the RTI Act and the applicant's submissions, I can identify no other public interest factors or considerations that might arise to favour disclosure of the Information in Issue. In this regard, I note that the factor stated in item 8 concerning personal information of a child, might, at first glance, appear to have some application. This factor, however, only arises where, relevantly, the underlying access application is one brought by a parent on behalf of a child (which this application is not – see further paragraphs 52-53). Similarly, the applicant's submissions as to QPS' 'unlawful' actions might at face value conceivably enliven item 18, contribution to the enforcement of the criminal law. As with other factors discussed at paragraphs 34-37, however, apart from the applicant's assertions, there is nothing before me to suggest criminal activity that might be redressed by disclosure of the Information in Issue.

<sup>28</sup> Noting, too, that if the Information in Issue is 'material evidence' in proceedings brought by the applicant, then it is difficult to see how it will not ultimately be available to him under applicable court disclosure processes. While the applicant has submitted that QPS has resisted disclosure under those processes, the relevant court will, accepting the applicant's contentions are correct, presumably rectify this if that information is germane to any claim. It is also relevant to note that, unlike disclosure under the IP Act, disclosure via such curial process would ordinarily be subject to control and restriction, avoiding potentially negative public interest consequences that could follow unconditional disclosure and which I have discussed below.

<sup>29</sup> Schedule 4, part 4, section 6 of the RTI Act.

<sup>30</sup> Section 12 of the IP Act.

<sup>31</sup> In this specific context, '*conveying to any person or entity information not already known to them*': *TE66LB and Queensland University of Technology; H9P6ZM (Third Party) & Ors* [2019] QICmr 9 (29 March 2019) at [129], citing *Australian Broadcasting Corporation and Department of Child Safety, Youth and Women* [2018] QICmr 47 (21 November 2018). There is some Information in Issue - eg, an instance, at around the 1.21 mark of Part 2, of the applicant speaking information which would be known to the applicant, and therefore may not be subject to schedule 4, part 4, section 6 in accordance with the above definition.

<sup>32</sup> I.e., both words spoken, and an individual's tone, demeanour or emotional state in speaking those words or interacting with government: see generally *New York Times Co. and National Aeronautics and Space Administration*, 920 F.2d 1002 (D.C. Cir. 1990, 1006), discussed and applied in *Williamson and Department of Police; "A" (Third Party)* (2005) 7 QAR 51 (*Williamson*), a decision affirming a QPS decision to refuse access under the former *Freedom of Information Act 1992* (Qld) (*FOI Act*) to an audio and video recording of a police interview. *Williamson* considered the application of the former '*personal affairs*' exemption as contained in section 44(1) of the FOI Act; relevant observations may nevertheless be usefully applied in the present case.

information under the IP Act<sup>33</sup> would be relatively significant. This consideration warrants substantial weight.

### **Prejudice protection of right to privacy**

41. A closely-related factor counting against disclosure of information arises for consideration where disclosure of that information could reasonably be expected to prejudice the protection of a person's right to privacy.<sup>34</sup>
42. The concept of '*privacy*' is not defined in the RTI Act. It can, however, be viewed as the right of an individual to preserve their personal sphere free from interference from others.<sup>35</sup>
43. In this case, I consider that allowing unrestricted access to all of the Information in Issue could reasonably be expected to prejudice the protection of the applicant's child's right to privacy.<sup>36</sup> A child's interactions with public officials – and their demeanour and tone in doing so – are matters that, in my view, fall within the child's personal sphere,<sup>37</sup> as are those officials' comments to and opinions about that child, and the child's welfare. Releasing information revealing inherently personal matters of this kind could, in my view, reasonably be expected to prejudice the protection of the child's right to privacy. In view of the child's age, and the nature of the recorded incident, I afford this factor favouring nondisclosure significant weight.
44. Aside from the specific harm and nondisclosure factors discussed above,<sup>38</sup> I consider there is, more generally, a strong public interest in ensuring that government agencies:
  - safeguard privacy, and treat with respect the personal information they collect from members of the community – particularly information concerning children, who will not usually be in a position to exercise control over use or dissemination of their personal information – and, ordinarily,
  - limit use and dissemination of that personal information to the purpose for which it was collected.<sup>39</sup>
45. Considerations of the above kind are highly relevant in this case.

### **Balancing the public interest**

46. I have identified three considerations favouring disclosure, which, for reasons explained above, warrant modest weight.
47. On the other hand, telling against disclosure of the Information in Issue are the considerations discussed in paragraphs 38-43 – to which I have accorded substantial and significant weight respectively, and the strong general public interest considerations discussed in paragraph 44.

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<sup>33</sup> There being no restrictions on dissemination of information released under the IP Act: see further paragraph 51.

<sup>34</sup> Schedule 4, part 3, item 3 of the RTI Act.

<sup>35</sup> Paraphrasing the Australian Law Reform Commission's definition of the concept in "For your information: Australian Privacy Law and Practice" *Australian Law Reform Commission Report No. 108* released 11 August 2008, at paragraph 1.56. This consideration can apply to favour nondisclosure of information other than personal information.

<sup>36</sup> And, as regards the 'pixelated' footage toward the end of Part 2, that of third parties also featured in this section of this recording.

<sup>37</sup> Noting the Information Commissioner's observations in *Williamson* that a person's voice may be recognised as information distinct from the words used alone (at [63]); information which, given it reveals inflections and other 'non-lexical' information, is 'of...[its]...nature more intrusive and revelatory of what is inherently personal...than just the words' an individual may have spoken. (At [62].)

<sup>38</sup> Remembering that the lists of public interest balancing factors in schedule 4 to the RTI Act are not exhaustive: see paragraph 29.

<sup>39</sup> As reflected in Parliament's enacting the IP Act, particularly Information Privacy Principles 10 and 11 scheduled to that Act – the purpose in this case being to aid QPS officers in discharge of official duties.

48. Balancing relevant public interest considerations against one another, I consider that factors weighing against release of the Information in Issue in this case displace those favouring disclosure.
49. In making my decision, I have taken into account the fact that the applicant, is, as noted, the child's father, and was witness to some of the incident featured in the Recordings. I do not, however, consider that these matters significantly diminish the strong privacy interest attaching to the Information in Issue.
50. As I reasoned in my letter to the applicant dated 12 April 2019, witnessing an incident in passing – an inherently transitory experience – and obtaining unconditional access to an audio-visual recording of the same events are, in my view, qualitatively different in nature, the latter comprising a potentially serious invasion of privacy.
51. Additionally, while disclosure under the RTI Act is not taken to be disclosure to the world at large, once information is disclosed, its dissemination cannot be controlled.<sup>40</sup> I am satisfied that disclosing the Information in Issue – generally, relatively sensitive personal information of a young child – under a general information access scheme, could reasonably be expected to significantly intrude on the privacy of other individuals.
52. I also note the applicant's submissions to the effect that he has or intends to make a 'representative' application<sup>41</sup> for access to the entirety of the Recordings, on behalf of the child featured in the Recordings, and that given this, I should exercise some discretion to '*transition this request*'<sup>42</sup> to include the applicant's child as applicant: essentially, to 'look through' the fact the application the subject of the present review is not an application made on behalf of the child, and treat it as if it were.
53. The short answer to this submission is that I do not have any such discretion. As the access application was made by the applicant in his personal capacity, I am required to consider whether QPS is justified in refusing the applicant **as an individual** access to the Information in Issue. For reasons explained above, I am satisfied that it is.

## DECISION

54. I affirm the decision under review. Access to the Information in Issue may be refused, under section 67(1) of the IP Act and section 47(3)(b) of the RTI Act
55. I have made this decision under section 123 of the IP Act, as a delegate of the Information Commissioner, under section 139 of the IP Act.

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**Louisa Lynch**  
**Right to Information Commissioner**

**Date: 13 June 2019**

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<sup>40</sup> *Troiani and Queensland Police Service* (Unreported, Queensland Information Commissioner, 21 August 2012), [25].

<sup>41</sup> Section 45 of the IP Act provides for access applications by parents for children.

<sup>42</sup> Email dated 7 May 2019.



## APPENDIX

### Significant procedural steps

Date	Event
29 June 2018	OIC received the external review application.
2 July 2018	OIC notified the applicant and QPS that the application had been received and asked QPS to provide the relevant procedural documents.
9 July 2018	The applicant requested additional information from OIC.
11 July 2018	OIC provided the applicant with the requested information.
13 July 2018	OIC received the requested information from QPS.
3 August 2018	OIC requested additional information from QPS.
21 August 2018	The applicant requested, and OIC provided, an update on the status of the review. OIC received the requested information from QPS.
5 October 2018	OIC requested additional information from QPS and provided the applicant with an update on the status of the review.
31 October 2018	OIC received the requested information from QPS and provided the applicant with an update on the status of the review.
2 November 2018	OIC received additional information from the applicant.
13 November 2018	OIC conveyed its position to the applicant in relation to accepting the application for external review out of time and requested submissions.
14 November 2018	The applicant requested, and OIC provided, a copy of the external review application. The applicant provided the requested submission.
15 November 2018	OIC requested additional information from QPS.
4 December 2018	OIC received the requested information from QPS.
20 December 2018	OIC notified the applicant and QPS that the external review application had been accepted out of time.
29 January 2019	OIC provided the applicant with additional information clarifying some issues in the external review.
1 February 2019	OIC received additional information from QPS.
5 March 2019	OIC requested submissions from QPS.
6 March 2019	OIC received the requested submissions from QPS.
7 March 2019	OIC wrote to the applicant, providing information and requesting submissions in response.
8 March 2019	The applicant requested, and OIC provided, clarification of OIC's letter dated 7 March 2019.
15 March 2019	The applicant provided OIC with submissions.
18 March 2019	OIC provided QPS with additional information and received submissions in response
22 March 2019	OIC provided the applicant with an update on the status of the review.
23 March 2019	OIC received additional submissions from the applicant.
1 April 2019	OIC provided QPS with additional information and requested submissions in response.
10 April 2019	OIC received the requested submissions from QPS.

Date	Event
12 April 2019	OIC conveyed a preliminary view to the applicant and requested submissions in response.
7 May 2019	OIC received the requested submissions from the applicant.
10 May 2019	OIC received additional submissions from the applicant.
23 May 2019	OIC provided the applicant with an update on the status of the review and clarified some remaining issues.