



Decision and Reasons for Decision

Citation:	<i>H37 and Queensland Police Service [2023] QICmr 22 (30 May 2023)</i>
Application Number:	316750
Applicant:	H37
Respondent:	Queensland Police Service
Decision Date:	30 May 2023
Catchwords:	ADMINISTRATIVE LAW - RIGHT TO INFORMATION - CONTRARY TO PUBLIC INTEREST INFORMATION - request for documents about applicant - accountability, transparency, fair treatment and administration of justice - personal information, privacy and ability to obtain information - whether disclosure 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 applied to the Queensland Police Service (**QPS**) under the *Information Privacy Act 2009* (Qld) (**IP Act**) to access certain documents relating to a complaint made about him and a discipline matter involving him.¹
2. QPS refused to deal with the application under section 59 of the IP Act, on the ground that it related to an ongoing investigation.²
3. The applicant then applied to the Office of the Information Commissioner (**OIC**) for an external review.³
4. During the review, QPS located documents relevant to the application and disclosed them to the applicant, subject to the deletion of certain information. The applicant remains dissatisfied with the level of information released to him and continues to seek access to the undisclosed information.

¹ The application is dated 22 November 2021.

² Decision dated 8 June 2022.

³ External review application dated 13 June 2022.

5. For the reasons set out below, I set aside QPS' decision and find that access may be refused to the information remaining in issue, on the basis that its disclosure would, on balance, be contrary to the public interest.⁴

Reviewable decision

6. The decision under review is QPS' decision dated 8 June 2022 refusing to deal with the application.

Evidence considered

7. The evidence, submissions, legislation and other material I have considered in reaching my decision are set out in these reasons (including footnotes and the appendix). The significant procedural steps taken during the external review are set out in the appendix.
8. I have also had regard to the *Human Rights Act 2019* (Qld) (**HR Act**), particularly the right to seek and receive information and the right to privacy and reputation.⁵ I consider a decision-maker will be '*respecting and acting compatibly with*' those rights and others prescribed in the HR Act, when applying the law prescribed in the IP Act and RTI Act.⁶ I have acted in this way in making this decision, in accordance with section 58(1) of the HR Act.⁷

Information in issue

9. The applicant applied to access the complaint made about him, an executive briefing note and emails, and diary entries and notes made by two specified officers.⁸
10. As noted in paragraph 4, QPS located documents relevant to the application on external review and disclosed these to the applicant, subject to the deletion of certain information. The refused information subject to this decision appears on 50 pages⁹ (**Information in Issue**). While I am unable to disclose the content of this information,¹⁰ broadly, it comprises:
 - the name of the complainant and information provided by, or about, that individual
 - information identifying the sensitive nature of the complaint¹¹
 - information¹² which QPS obtained from, or about, other individuals; and
 - correspondence sent to individuals other than the applicant.

⁴ Under section 67(1) of the IP Act and sections 47(3)(b) and 49 of the *Right to Information Act 2009* (Qld) (**RTI Act**). Section 67(1) of the IP Act sets out that an agency may refuse access to information in the same way and to the same extent that the agency could refuse access to the document under section 47 of the RTI Act were the document the subject of an access application under the RTI Act.

⁵ Sections 21 and 25 of the HR Act.

⁶ *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].

⁷ I note the following observations made by Bell J in *XYZ* at [573], on the interaction between equivalent pieces of Victorian legislation (namely, the *Freedom of Information Act 1982* (Vic) and the *Charter of Human Rights and Responsibilities Act 2006* (Vic)): '*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*'. I further note that OIC's approach to the HR Act set out in this paragraph was considered and endorsed by the Queensland Civil and Administrative Tribunal in *Lawrence v Queensland Police Service* [2022] QCATA 134 at [23] (where Judicial Member McGill saw '*no reason to differ*' from our position).

⁸ The application sought documents within the period 20 July 2020 to 3 August 2020.

⁹ Comprising 33 full pages and parts of 17 pages.

¹⁰ Section 121(3) of the IP Act which relevantly requires the Information Commissioner not to disclose information that is exempt or claimed to be contrary to the public interest information in a decision or reasons for a decision.

¹¹ As well as a separate complaint the applicant had made involving the same individual.

¹² Including statements.

Issue for determination

11. The issue for determination in this review is whether access to the Information in Issue may be refused on the ground that disclosure would, on balance, be contrary to the public interest.
12. The applicant provided submissions on external review,¹³ which in part raised concerns with OIC about how his access application was processed by QPS (including what he perceived as delays in that process).¹⁴ I have considered these submissions in the context of relevant public interest factors, as my decision in this matter is limited to the consideration of whether access to the Information in Issue can be refused.¹⁵

Relevant law

13. Under the IP Act, an individual has a right to be given access to documents of a Queensland government agency, to the extent they contain the individual's personal information.¹⁶ However, this right of access is subject to limitations, including the grounds on which access to information may be refused.¹⁷
14. One ground of refusal is where disclosing information would, on balance, be contrary to the public interest.¹⁸ 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.¹⁹
15. In assessing whether disclosure of information would, on balance, be contrary to the public interest, a decision maker must:²⁰
 - identify factors irrelevant to the public interest and disregard them²¹
 - 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.

Findings

16. I have not taken any irrelevant factors into account in making this decision.

Factors favouring disclosure

17. Some of the Information in Issue relates to the applicant and comprises his personal information. This gives rise to a factor favouring disclosure,²² to which I attribute high

¹³ As set out in the appendix.

¹⁴ External review application.

¹⁵ This was also conveyed to the applicant on 20 July 2022.

¹⁶ Section 40 of the IP Act. 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 reasonably apparent, or can reasonably be ascertained, from the information or opinion.*'

¹⁷ The grounds on which access can be refused are set out in section 47 of the RTI Act. As noted above, section 67(1) of the IP Act provides that access may be refused to information in the same way and to the same extent as information may be refused under the RTI Act.

¹⁸ Sections 47(3)(b) and 49 of the RTI Act.

¹⁹ However, there are some recognised public interest considerations that may apply for the benefit of an individual.

²⁰ Section 49(3) of the RTI Act.

²¹ Including those at schedule 4, part 1 of the RTI Act.

²² Schedule 4, part 2, item 7 of the RTI Act.

weight. However, this information about the applicant is intertwined with the personal information of other individuals to such an extent that it cannot be disclosed without also disclosing the personal information of those other individuals (giving rise to factors favouring nondisclosure discussed below).

18. The RTI Act recognises that public interest factors favouring disclosure will arise where disclosing information could reasonably be expected to:
- enhance the government’s accountability²³
 - inform the community of the Government’s operations, including, in particular, the policies, guidelines and codes of conduct followed by the Government in its dealings with members of the community;²⁴ and
 - reveal the reason for a government decision and any background or contextual information that informed the decision.²⁵
19. QPS must be transparent and accountable about how it deals with received allegations of contraventions, or possible contraventions, of the law. The applicant submitted that the information he applied to access is of a *‘procedural nature rather than evidential’* and relates to what preceded the investigation.²⁶ I accept that disclosing the Information in Issue would provide the applicant with a more complete picture of the allegations that have been made to QPS by, and about, him and the actions taken by QPS in respect of those matters. However, QPS has disclosed a significant amount of information to the applicant and the applicant has confirmed to OIC that, in a separate process, he was provided with *‘the full investigation file’*²⁷ and *‘all documentation pertinent to the matter including all statements, audio recordings and transcripts of interviews and reporting by the investigating officer’*.²⁸ I consider these disclosures have substantially advanced the accountability and transparency factors,²⁹ by enabling scrutiny of QPS’ actions and providing background information which informed those actions. Given the specific content of the Information in Issue, I do not consider its disclosure would further advance these accountability and transparency factors in any significant way. In these circumstances, I attribute low weight to these factors.
20. Public interest factors favouring disclosure also arise in circumstances where disclosing information could reasonably be expected to allow or assist enquiry into, or reveal or substantiate, deficiencies in the conduct of QPS or its officers.³⁰ The applicant submitted that these factors apply, and he believes disclosure of the Information in Issue will support his assertion that *‘there was an insufficient or incompetent preliminary process that commenced the complaint process’*.³¹
21. As noted above, the applicant has confirmed that, under separate processes, he has received significant information from QPS in respect of both the complaint and the discipline matter. While I acknowledge that the applicant disagrees with how the complaint was considered by QPS, I am not satisfied that there is anything within this

²³ Schedule 4, part 2, item 1 of the RTI Act.

²⁴ Schedule 4, part 2, item 3 of the RTI Act.

²⁵ Schedule 4, part 2, item 11 of the RTI Act.

²⁶ Submissions dated 13 August 2022. In his submissions dated 2 April 2023, the applicant confirmed the information he sought related to the preliminary states of the investigation.

²⁷ External review application. In his 3 December 2022 submissions the applicant confirmed that he had previously received *‘statements, records of interview, the investigation findings and report’*.

²⁸ External review application. The applicant made similar submissions on 3 December 2022.

²⁹ Schedule 4, part 2, items 1, 3 and 11 of the RTI Act.

³⁰ Schedule 4, part 2, items 5 and 6 of the RTI Act.

³¹ Submissions dated 3 December 2022. The applicant also confirmed in his submissions dated 2 April 2023 that he was seeking to access information about *‘what steps were taken or not taken to ensure fairness’*—more specifically, the applicant believes that guidelines were not followed and relevant witnesses were not contacted, and that disclosure of the requested information will address his concerns in that regard.

particular Information in Issue which gives rise to an expectation that *its* disclosure would allow or assist enquiry into, or reveal or substantiate, agency or officer conduct deficiencies. Accordingly, to the extent these factors apply to favour disclosure,³² I afford them only low weight.

22. The applicant also submitted that '*false or misleading information had been provided*' to QPS, which led to initial disciplinary action being taken against him while an investigation was undertaken.³³ A factor favouring disclosure arises where disclosing information could reasonably be expected to reveal the information was incorrect, out of date, misleading, gratuitous, unfairly subjective or irrelevant.³⁴ As I have noted above, the Information in Issue includes information obtained from and/or about other individuals. Information of this nature is shaped by an individual's observations, perceptions, concerns and opinions. This inherent subjectivity does mean that the information is necessarily incorrect or misleading.³⁵ Having reviewed the Information in Issue, there is nothing before me to suggest that this information is incorrect, out of date, misleading, gratuitous, unfairly subjective or irrelevant. On this basis, I find that, to the extent this factor applies, I afford it only low weight.³⁶
23. Public interest factors favouring disclosure will arise where disclosing information could reasonably be expected to:
- advance the fair treatment of individuals and other entities in accordance with the law in their dealings with agencies³⁷
 - contribute to the administration of justice generally, including procedural fairness;³⁸ and
 - contribute to the administration of justice for a person.³⁹
24. The applicant submitted that the allegations against him have '*irreparably damaged*' his reputation.⁴⁰ I note that the investigation process relevant to this matter has been finalised. The applicant's submissions also confirm that he participated in the investigation and disciplinary processes; was notified of the process outcome and has received a significant amount of information from QPS.⁴¹ In all these circumstances, and given the nature of the Information in Issue, I am not satisfied that there is a reasonable expectation its disclosure would, in any meaningful way, further advance the applicant's fair treatment in his dealings with QPS and other agencies or contribute to the general administration of justice, including procedural fairness. On this basis, while these factors may apply,⁴² I afford them only low weight.
25. In determining whether the factor relating to administration of justice for a person applies to favour disclosure,⁴³ I must consider whether:

³² Schedule 4, part 2, items 5 and 6 of the RTI Act.

³³ Submissions dated 3 December 2022.

³⁴ Schedule 4, part 2, item 12 of the RTI Act.

³⁵ *Marshall and Department of Police* (Unreported, Queensland Information Commissioner, 25 February 2011) (*Marshall*) at [15]-[20]; *Brodsky and Gympie Regional Council* [2014] QICmr 17 (2 May 2014) at [32].

³⁶ Schedule 4, part 2, item 12 of the RTI Act.

³⁷ Schedule 4, part 2, item 10 of the RTI Act.

³⁸ Schedule 4, part 2, item 16 of the RTI Act.

³⁹ Schedule 4, part 2, item 17 of the RTI Act.

⁴⁰ Submissions dated 3 December 2022.

⁴¹ I note that the information provided with the applicant's 3 August 2022 submission also confirms that he was notified of the review options available to him in respect of the disciplinary matter.

⁴² Schedule 4, part 2, items 10 and 16 of the RTI Act. The public interest factor in schedule 4, part 2, item 10 of the RTI Act does not require a decision-maker to ensure that an applicant is provided with sufficient information to enable the applicant to be *subjectively* satisfied that he or she received fair treatment (*F60XCX and Department of Natural Resources and Mines* [2017] QICmr 19 (9 June 2017) at [101]).

⁴³ Schedule 4, part 2, item 17 of the RTI Act.

- the applicant has suffered loss, or damage, or some kind of wrong, in respect of which a remedy is, or may be, available under the law
 - the applicant has a reasonable basis for seeking to pursue the remedy; and
 - disclosing the information held by an agency would assist the applicant to pursue the remedy or evaluate whether a remedy is available or worth pursuing.⁴⁴
26. Although the applicant holds concerns about how the investigation and disciplinary processes were conducted, those processes have been finalised. I consider that the substantial information which has already been disclosed to the applicant (including via separate processes) has substantially advanced this public interest factor. There is no evidence before me to indicate that disclosure of the Information in Issue is required to enable the applicant to pursue any specific remedy or evaluate whether any specific remedy is available or worth pursuing. For these reasons, I do not consider this factor favouring disclosure applies.
27. Having regard to the particular nature of the Information in Issue, I cannot identify any other public interest considerations favouring its disclosure.⁴⁵

Factors favouring nondisclosure

28. The RTI Act recognises that there is a public interest harm⁴⁶ in disclosing an individual's personal information to someone else and that disclosing information which could reasonably be expected to prejudice the protection of an individual's right to privacy gives rise to a public interest factor favouring nondisclosure.⁴⁷ The concept of 'privacy' is not defined in the IP Act or the RTI Act. It can, however, essentially be viewed as the right of an individual to preserve their 'personal sphere' free from interference from others.⁴⁸
29. The Information in Issue includes information provided by and about other individuals—for example, it contains another individual's observations, opinions and perspectives about matters that are the subject of the complaint. On this basis, I am satisfied that the Information in Issue comprises the personal information of other individuals. As I have noted above, to the extent the applicant's personal information appears within the Information in Issue, it is intertwined with the personal information of others. It is reasonable to expect that individuals who provided information to QPS' complaint investigation would have expected that such information would be used for the investigation (and any subsequent disciplinary processes), however they would not have contemplated that such information would be disclosed to others under the IP Act or RTI Act. Given the sensitive (and in some instances, highly personal) nature of this information, I am satisfied that its disclosure would be a significant intrusion into the privacy of these other individuals and the extent of the harm that could be expected to

⁴⁴ *Willsford and Brisbane City Council* (1996) 3 QAR 368 at [17] and confirmed in *10S3KF and Department of Community Safety* (Unreported, Queensland Information Commissioner, 16 December 2011) at [16] and *C98 and Cairns and Hinterland Hospital and Health Service* [2021] QICmr 46 (9 September 2021) at [26].

⁴⁵ Having carefully considered all factors listed in schedule 4, part 2 of the RTI Act, I cannot see how disclosing the Information in Issue could, for example, contribute to debate on important issues or matters of serious interest or ensure oversight of expenditure of public funds (schedule 4, part 2, items 2 and 4 of the RTI Act); or reveal measures relating to public health and safety or contribute to the maintenance of peace and order or enforcement of the criminal law (schedule 4, part 2, items 14, 15 and 18 of the RTI Act). The applicant's submissions dated 3 December 2022 and 2 April 2023 outline what he considers to be additional public interest considerations. While the list of public interest factors in schedule 4 of the RTI Act is not exhaustive, I do not consider the applicant's submissions raise any additional factors which favour disclosure of the Information in Issue. In the event that further relevant factors exist in favour of disclosure, I am satisfied that there is no evidence before me to suggest that any would carry sufficient weight to outweigh the significant weight that I have afforded to the public interest factors that favour the nondisclosure of the Information in Issue.

⁴⁶ Schedule 4, part 4, section 6 of the RTI Act.

⁴⁷ Schedule 4, part 3, item 3 of the RTI Act.

⁴⁸ 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 12 August 2008, Volume 1, at paragraph 1.56.

arise from its disclosure would be significant.⁴⁹ On this basis, I afford significant weight to these factors which favour nondisclosure.

30. The applicant argues that, as he was supplied with other individual's personal information in documents he received as part of the investigation process, disclosure of the Information in Issue would '*in no way compromise others personal information*' and he is therefore entitled to be provided with that information.⁵⁰ I am unable to address the applicant's speculation about the contents of the Information in Issue.⁵¹ While I acknowledge that the applicant may be aware of some of the Information in Issue as a result of his involvement in the complaint investigation/disciplinary processes and the information which he has received through those processes,⁵² I do not consider this reduces the weight of these nondisclosure factors, particularly as there can be no restriction on the use, dissemination or republication of information disclosed under the IP Act. I also note that the right of access under the IP Act is not meant to duplicate, or serve as an adjunct to, other information access entitlements.⁵³
31. Public interest factors favouring nondisclosure also arise where disclosing information could reasonably be expected to prejudice the flow of information to law enforcement or regulatory agencies⁵⁴ or prejudice an agency's ability to obtain confidential information⁵⁵ or its management function.⁵⁶
32. The applicant submitted that he is aware of the identity of the reporting officer and that officers are legislatively required to report suspected misconduct.⁵⁷ As noted above, I am unable to address the applicant's speculation about the contents of the Information in Issue. There is a strong public interest in protecting the free flow of information to law enforcement agencies and the ability of those agencies to obtain information which is relevant to the investigation of potential contraventions of the law, including the opinions and observations of concerned individuals (whether they are complainants, witnesses, informers or the subjects of complaint).⁵⁸ Having carefully considered the Information in Issue, I consider it is reasonable to expect that individuals who provided information to QPS' investigation would contemplate that the information they provided would be treated as confidential and would only be used for the purpose of the investigation (or in any subsequent review or disciplinary processes). Routinely disclosing this type of information outside the investigation/disciplinary processes and under the IP Act would tend to discourage individuals from coming forward with relevant information or

⁴⁹ Given the sensitive subject matter of the complaint, I consider the small amount of personal work information of public officers within the Information in Issue attracts a high privacy interest.

⁵⁰ Submissions dated 2 April 2023. The applicant's submissions identify various documents and information which he has received through separate processes.

⁵¹ Section 121(3) of the IP Act.

⁵² He may also be aware of some of the Information in Issue by virtue of the surrounding text which has been disclosed to him in this external review.

⁵³ In this regard I note the Information Commissioner's following comments in *Phylard v Department of Police* (Unreported, Queensland Information Commissioner, 31 August 2011) at [24]: '*The RTI Act was not ... designed to serve as an adjunct to court processes, but to comprise a stand-alone mechanism for enabling public access to government-held information. Obviously, the applicant is entitled to elect to pursue access under the right of access conferred by the RTI Act. In doing so, however, she must accept the qualifications upon and limitations to that right imposed by the Act itself: including refusal of access where ... disclosure would disclose personal information or infringe upon an individual's right to privacy.*' While that this case concerned an access application made under the RTI Act, I consider that the comment applies equally to an access application made under the IP Act.

⁵⁴ Schedule 4, part 3, item 13 of the RTI Act.

⁵⁵ Schedule 4, part 3, item 16 of the RTI Act. Schedule 4, part 4, section 8(1) of the RTI Act also recognises that disclosure of information could reasonably be expected to cause a public interest harm if the information consists of information of a confidential information that was communicated in confidence and disclosure of the information could reasonably be expected to prejudice the future supply of information of this type.

⁵⁶ Schedule 4, part 3, item 19 of the RTI Act. Schedule 4, part 4, section 3(c) of the RTI Act also recognises that a public interest harm will arise where disclosing information could have a substantial adverse effect on the management or assessment by an agency of the agency's staff.

⁵⁷ Submissions received 2 April 2023.

⁵⁸ See for example: *P6Y4SX and Queensland Police Service* [2015] QICmr 25 (11 September 2015), *P6Y4SX and Department of Police* (Unreported, Queensland Information Commissioner, 31 January 2012), and *SW5Z7D and Queensland Police Service* [2016] QICmr 1 (15 January 2016) and *Marshall*.

participating openly in future investigations, particularly where the information involves sensitive personal matters or where information has been provided on a confidential basis. Accordingly, I afford significant weight to these factors favouring nondisclosure.

Balancing the relevant public interest factors

33. I have taken into account the pro-disclosure bias of the IP Act.⁵⁹ For the reasons set out above, I am satisfied that the nondisclosure factors relating to the protection of privacy and personal information of other individuals and the ability of agencies to obtain confidential information and manage their staff are deserving of significant weight.
34. On the other hand, I have afforded high weight to the factor favouring disclosure of the applicant's personal information within the Information in Issue, however, that personal information of the applicant is inextricably intertwined with the personal information of other individuals. In addition, and for the reasons outlined above, I have identified additional disclosure factors which favour disclosure of the Information in Issue (including those relating to accountability and transparency, fair treatment and the administration of justice).⁶⁰ However, taking into account the nature of the Information in Issue, I have afforded these factors only low weight.
35. On balance, I am satisfied that the public interest factors favouring nondisclosure outweigh the factors favouring disclosure. Accordingly, I find that disclosure of the Information in Issue would, on balance, be contrary to the public interest and access may be refused on this basis.⁶¹

DECISION

36. For the reasons set out above, as a delegate of the Information Commissioner,⁶² I set aside QPS' decision and find that access to the Information in Issue may be refused, as its disclosure would, on balance, be contrary to the public interest.⁶³

S Martin
Assistant Information Commissioner

Date: 30 May 2023

⁵⁹ Section 64 of the IP Act.

⁶⁰ Schedule 4, part 2, items 1, 3, 5, 6, 10, 11, 12 and 16 of the RTI Act.

⁶¹ Section 67(1) of the IP Act and sections 47(3)(b) and 49 of the RTI Act.

⁶² Under section 139 of the IP Act.

⁶³ Section 67(1) of the IP Act and sections 47(3)(b) and 49 of the RTI Act.

APPENDIX

Significant procedural steps

Date	Event
13 June 2022	OIC received the external review application.
20 July 2022	OIC notified the applicant and QPS that the application for external review had been accepted and requested information from QPS.
26 July 2022	OIC received the applicant's confirmation of the information he was seeking to access on external review.
5 August 2022	OIC received QPS submissions which indicated that the relevant investigation remained ongoing.
11 August 2022	OIC asked the applicant to provide evidence supporting his contention that the relevant investigation had been finalised.
13 August 2022	OIC received the applicant's submissions and associated documents.
19 August 2022	OIC wrote to QPS, confirming their acceptance that the relevant investigation had been finalised and requesting that QPS locate relevant documents and provide submissions.
22 August 2022	OIC received the requested information from QPS.
20 September 2022	OIC asked QPS to conduct further searches and provide additional information.
27 October 2022	OIC received the requested information from QPS.
25 November 2022	OIC notified the applicant that QPS had agreed to disclose located documents, subject to the redaction of certain information, and asked the applicant if he accepted such disclosure in resolution of the review.
2 December 2022	QPS disclosed information to the applicant.
3 December 2022	OIC received the applicant's submissions, confirming he continued to seek access to the undisclosed information.
17 February 2023	OIC conveyed a preliminary view to QPS.
28 February 2023	OIC received QPS' further submissions.
13 March 2023	OIC conveyed a preliminary view to QPS that certain further information could be disclosed to the applicant.
14 March 2023	OIC received QPS' notification that it accepted the preliminary view.
16 March 2023	QPS disclosed further information to the applicant and OIC conveyed a preliminary view to the applicant about the remaining undisclosed information.
2 April 2023	OIC received the applicant's further submissions.