



## Decision and Reasons for Decision

---

**Citation:** *Queensland Police Service and Department of Customer Services, Open Data and Small and Family Business; and Another* [2026] QICmr 72 (12 May 2026)

**Application Number:** 318384

**Applicant:** Queensland Police Service

**Respondent:** Department of Customer Services, Open Data and Small and Family Business

**Third Party:** Nadel

**Decision Date:** 12 May 2026

**Catchwords:** ADMINISTRATIVE LAW - RIGHT TO INFORMATION - REFUSAL OF ACCESS - EXEMPT INFORMATION - LAW ENFORCEMENT AND PUBLIC SAFETY INFORMATION - whether disclosure of information about a police database could reasonably be expected to prejudice a system or procedure for the protection of persons, property or the environment - schedule 3, section 10(1)(i) of the *Right to Information Act 2009* (Qld)

ADMINISTRATIVE LAW - RIGHT TO INFORMATION - REFUSAL OF ACCESS - CONTRARY TO THE PUBLIC INTEREST INFORMATION - request to access the addresses of two individuals - whether disclosure would, on balance, be contrary to the public interest - sections 47(3)(b) and 49 of the *Right to Information Act 2009* (Qld)

### DECISION

1. For the below reasons, I vary<sup>1</sup> the reviewable decision and find that access may be refused to the information which remains for consideration, as it comprises exempt information and its disclosure would, on balance, be contrary to the public interest.
2. This means that no further information is to be released to the Third Party.

---

<sup>1</sup> Under section 110(1)(b) of the *Right to Information Act 2009* (Qld) (RTI Act). On 1 July 2025 key parts of the *Information Privacy and Other Legislation Amendment Act 2023* (Qld) (IPOLA Act) came into force, effecting changes to the RTI Act and *Information Privacy Act 2009* (Qld) (IP Act). As the applicant's application was made before this change, the RTI Act and IP Act **as in force prior to 1 July 2025** remain applicable to it. This is in accordance with transitional provisions in chapter 7, part 9 of the RTI Act and chapter 8, part 3 of the IP Act, which require that applications on foot before 1 July 2025 are to be dealt with as if the IPOLA Act had not been enacted. Accordingly, references to the RTI Act and IP Act in this decision are to those Acts, which may be accessed at <https://www.legislation.qld.gov.au/view/html/inforce/2024-12-31/act-2009-013> and <https://www.legislation.qld.gov.au/view/html/inforce/2024-12-31/act-2009-014> respectively.

3. My reasons for the decision follow.



---

**T Lake**  
**Principal Review Officer**

**Date: 12 May 2026**

## REASONS FOR DECISION

### Summary

4. By application to the Department of Transport and Main Roads (**DTMR**) dated 20 August 2024, an access applicant (the **Third Party** in this external review) sought to access information under the RTI Act which, in summary, related to the application of identified assurance regimes to certain types of Queensland Police Service (**QPS**) 'ICT' projects and programs. The Third Party subsequently agreed to revise the terms of the application and exclude personal information.<sup>2</sup>
5. DTMR located 234 pages as relevant to the Access Application (**Located Pages**). DTMR consulted QPS (under section 37 of the RTI Act) to obtain QPS' views about disclosure of information to the Third Party. QPS objected to disclosure of all information within the Located Pages.
6. DTMR decided to release some, but not all, of the information in the Located Pages to the Third Party<sup>3</sup> and issued decisions to that effect to both the Third Party and QPS on 25 November 2024.<sup>4</sup>
7. QPS then applied<sup>5</sup> to the Office of the Information Commissioner (**OIC**) for external review of DTMR's decision to release information to the Third Party. The Third Party did not seek external review of DTMR's decision refusing access to the remaining information within the Located Pages.<sup>6</sup>
8. During the review:
  - machinery of government changes transferred relevant responsibility from DTMR to Department of Customer Services, Open Data and Small and Family Business (**Department**)<sup>7</sup>
  - QPS withdrew its disclosure objections to most of the information which DTMR had decided to release to the Third Party—as a result, that information was released to the Third Party,<sup>8</sup> and
  - the Third Party was joined as a participant.<sup>9</sup>
9. The Third Party continues to seek access to the remaining information which DTMR had decided to disclose to him in the decision under review and in respect of which QPS maintains an objection to disclosure (**Information in Issue**).

### Reviewable decision

10. The decision under review is DTMR's decision to QPS dated 25 November 2024.

---

<sup>2</sup> The revised terms of the access application were confirmed by DTMR in an email to the Third Party dated 25 September 2024 and the Third Party's agreement to exclude personal information was confirmed in an email dated 17 October 2024. For ease of reference, I will refer to the access application, as amended in this way, as the Access Application.

<sup>3</sup> Access to the information which DTMR had decided to disclose was deferred.

<sup>4</sup> During the review, I confirmed to the Third Party that, although DTMR's decision contained some numerical errors about the number of pages to which access was given/refused, OIC had received a full copy of the Located Pages, marked by DTMR, to precisely identify the information to which DTMR had decided to give and refuse access.

<sup>5</sup> By email dated 19 December 2024.

<sup>6</sup> Accordingly, the information to which DTMR decided to refuse access is not the subject of this external review and is not addressed in this decision.

<sup>7</sup> These machinery of government changes became effective on 1 July 2025. As a result, existing RTI applications and reviews involving certain applications made to DTMR before the machinery of government changes now rest with the Department, including this external review. OIC received notification of these changes from DTMR on 23 January 2026.

<sup>8</sup> The Department sent the information to the Third Party on 9 April 2026.

<sup>9</sup> Under section 89 of the RTI Act.

## Evidence considered

11. The evidence, submissions, legislation and other material I have considered in reaching my decision are set out in these reasons (including footnotes). I have taken account of the parties' submissions<sup>10</sup> to the extent that they are relevant to the issue for determination in this review.
12. I have also had regard to the *Human Rights Act 2019* (Qld) (**HR Act**), particularly the right to seek and receive information.<sup>11</sup> I consider a decision-maker will be '*respecting and acting compatibly with*' that right and others prescribed in the HR Act, when applying the law prescribed in the RTI Act.<sup>12</sup> I have acted in this way in making this decision, in accordance with section 58(1) of the HR Act.<sup>13</sup>

## Information in issue

13. The Information in Issue comprises a small amount of information – specifically three portions of information which appear on pages 17, 85 and 234 of the Located Pages.
14. Although the RTI Act restricts the level of details that I can provide about the Information in Issue,<sup>14</sup> I can confirm that the refused information portion on page 85 duplicates the refused information portion on page 17.

## Issues for determination

15. It is QPS' position that the portion of information which appears on both pages 17 and 85 (**Category A Information**) comprises exempt information and that disclosure of the portion of information on page 234 (**Category B Information**) would, on balance be contrary to the public interest. The Third Party disagrees with QPS' position.<sup>15</sup>
16. Accordingly, the issues for determination are whether:
  - the Category A Information comprises exempt information; and
  - disclosure of the Category B Information would, on balance, be contrary to the public interest.
17. Under section 87(2) of the RTI Act, QPS bears the onus of establishing that a decision not to disclose the Information in Issue is justified or that the Information Commissioner should give a decision adverse to the Third Party.

---

<sup>10</sup> Including the Third Party's submissions in the External Review Application and the Third Party's emails dated 21 November 2025 and 10 March 2026.

<sup>11</sup> Section 21 of the HR Act.

<sup>12</sup> *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].

<sup>13</sup> I also 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*'.

<sup>14</sup> Section 108(3) of the RTI Act.

<sup>15</sup> As noted above, the Department was not the original decision-maker in respect of the Access Application. Given that context, when OIC asked the Department to respond about QPS' changed disclosure position, the Department confirmed (by letter dated 13 March 2026) that:

- QPS, as the subject matter expert, would be better placed to confirm whether, on balance, disclosure would be contrary to the public interest; and
- the Department otherwise maintained the disclosure position expressed by DTMR in the decision under review.

## General submissions made by the Third Party

18. QPS and the Third Party have made submissions relating to the issues for determination. However, the Third Party has also made submissions of a more general nature, and I address those here.
19. The Third Party raised concerns about the time it had taken for '*disclosure of the lion's share of these documents, which [QPS] have now conceded were never exempt under the RTI Act despite having asserted that they were when it lodged this review*'.<sup>16</sup> The Third Party also submitted that:

*In terms of the explanation that the decision provides, it should primarily concern the arguments that QPS relied on to argue that the entirety of the documents were exempt and the reasons OIC provided QPS to convince QPS that they were in fact disclosable. This would constitute an explanation for the delay that was adverse.*<sup>17</sup>
20. External review under the RTI Act is a merits review process<sup>18</sup> and the procedure to be followed in an external review is, subject to the Act, within the Information Commissioner's discretion. After conducting an external review of an agency's decision under the RTI Act (in circumstances where the review is unable to be resolved without a formal decision<sup>19</sup>), the Information Commissioner is required to decide, in a written decision, whether the agency's decision should be affirmed, varied or set aside.<sup>20</sup>
21. It is not unusual for review participants (whether they are an agency, an access applicant or a consulted third party) to change their position on external review. For example, an agency may agree to release information to which it had initially decided to refuse access, and an applicant may confirm to OIC that they no longer seek to access certain types of information which were, initially, in issue on review.
22. In this matter, and in accordance with OIC's external review procedures, I sought further and better particulars from QPS about its disclosure objections and asked QPS to confirm whether it maintained its disclosure objections for all of the information which DTMR had decided to disclose.<sup>21</sup> After receiving QPS' response, I conveyed a preliminary view<sup>22</sup> to QPS that it had not met its review onus and invited QPS to provide submissions in support of its nondisclosure position.<sup>23</sup>
23. As a result of the steps identified in the preceding paragraph, QPS informed OIC<sup>24</sup> that it no longer objected to disclosure of most of the information which DTMR had decided to release. As that information was then released to the Third Party, it is not necessary to address it in this decision. Nor do I consider it necessary to provide the Third Party with details of QPS' prior disclosure position for information which is no longer in issue.
24. When notifying the Third Party that QPS had withdrawn most of its disclosure objections, I conveyed a preliminary view to the Third Party about his entitlement under the RTI Act

---

<sup>16</sup> Third Party's submission received 29 April 2026.

<sup>17</sup> Third Party's submission received 29 April 2026.

<sup>18</sup> That is, external review is an administrative reconsideration of a case which can be described as '*stepping into the shoes*' of the primary decision-maker to reach the correct and preferable decision.

<sup>19</sup> As contemplated in section 90 of the RTI Act.

<sup>20</sup> Section 110(1) of the RTI Act.

<sup>21</sup> By letter dated 29 October 2025.

<sup>22</sup> It is the practice of OIC to convey a preliminary view, based on an assessment of the material before the Information Commissioner (or delegate) at that time, to an adversely affected participant. This is to explain the issues under consideration to the participant and affords them the opportunity to put forward any further information they consider relevant to those issues. It also forms part of the Information Commissioner's processes for resolution of external reviews.

<sup>23</sup> By letter dated 21 January 2026.

<sup>24</sup> Email dated 20 February 2026.

to access the Information in Issue. When doing so, I also explained the basis of QPS' remaining disclosure objections and invited the Third Party to provide submissions if he wished to contest OIC's preliminary view. The Third Party has provided submissions to OIC in support of his position.

25. I accept that the time taken to complete this external review has not met the Third Party's expectations. However, in the circumstances of this matter, I consider that the Third Party has been appraised of the general nature of the Information in Issue (and the basis of QPS' disclosure objections relevant to that information) and has been afforded an opportunity to put forward submissions supporting his position. As a result, I am satisfied that the Third Party was able to properly respond to OIC concerning the reviewable issues in this matter and has been afforded due process in this review.

## Category A Information

### Relevant law

26. The RTI Act gives a right of access to documents of government agencies.<sup>25</sup> However, this access right is subject to other provisions of the RTI Act, including grounds on which access to information may be refused.
27. An agency may refuse access to documents to the extent they comprise exempt information.<sup>26</sup> Relevantly, information is exempt if its disclosure could reasonably be expected<sup>27</sup> to prejudice a system or procedure for the protection of persons, property or the environment.<sup>28</sup> This exemption will apply if each of the following requirements are met:
- there exists an identifiable system or procedure
  - it is a system or procedure for the protection of persons, property or environment; and
  - disclosing the information under consideration could reasonably be expected to prejudice that system or procedure.

### Analysis

28. The information which has been disclosed to the Third Party confirms that the Category A Information concerns the '*Project Architecture*' for QPS' Client Management System. It also confirms that the project:
- spans a long period and is being delivered in a number of tranches
  - is intended to implement contemporary call and contact systems and processes to improve QPS' information capture, response and customer resolution; and
  - has objectives that include integrating services across multiple contact points within QPS and establishing a digital, expandable platform for future disaster and major event management.

---

<sup>25</sup> Section 23(1)(a) of the RTI Act.

<sup>26</sup> Sections 47(3)(a) and 48 of the RTI Act. Schedule 3 of the RTI Act sets out the categories of information which are exempt under the RTI Act.

<sup>27</sup> The term '*could reasonably be expected to*' requires that the expectation be reasonably based, that it is neither irrational, absurd or ridiculous, nor merely a possibility. The expectation must arise as a result of disclosure, rather than from other circumstances. Whether the expected consequence is reasonable requires an objective examination of the relevant evidence. It is not necessary for a decision-maker to be satisfied upon a balance of probabilities that disclosing the document will produce the anticipated prejudice. See *Nine Network Australia Pty Ltd and Department of Justice and Attorney-General* (Unreported, Queensland Information Commissioner, 14 February 2012) at [31].

<sup>28</sup> Schedule 3, section 10(1)(i) of the RTI Act.

29. On external review, QPS submitted that:<sup>29</sup>
- this Client Management System relates to QPS' emergency response systems, and its purpose is *'to respond to immediate and life-threatening situations where an urgent police response is necessary for the protection of the public'*; and
  - disclosure of the Category A Information could reasonably be expected to prejudice that system/procedure, particularly as it contains information about system interdependencies.
30. While the Third Party acknowledged that *'genuinely sensitive emergency-response interdependencies'* within the Category A Information *'may require protection'*, he seeks access to any components of the information which *'do not disclose sensitive operational interdependencies'*.<sup>30</sup>
31. I have carefully reviewed the Category A Information, the parties' submissions, and the information which has been disclosed to the Third Party. Having done so, I am satisfied that the Client Management System, which is the subject of the Category A Information, is an identifiable system or procedure being used (and, for any project tranches not yet delivered, to be used) by QPS for the protection of persons, property or environment. I consider its disclosure could reasonably be expected to disclose both the system interdependencies, and how information that QPS receives when undertaking its law enforcement functions is recorded and dealt with. This, in turn, could lead to individuals altering how they interact with QPS and undermine the effectiveness of the system. For this reason, I am also satisfied that disclosure of the Category A Information under the RTI Act (where there can be no restriction on its use, dissemination or publication) could reasonably be expected to prejudice this system or procedure.
32. The Third Party asked that OIC consider the exemption exceptions contained in schedule 3, section 10(2) of the RTI Act. More specifically, the Third Party submitted that *'if any part of the [Category A Information] merely provides a general outline of the structure of a program adopted by an agency for dealing with a contravention or possible contravention of the law, that information is not exempt under schedule 3, section 10(1)'*.<sup>31</sup>
33. I have carefully considered each of these exceptions and, given the particular nature of the Category A Information, I am satisfied none of them arise in respect of the Category A Information.
34. In terms of the Third Party's request for disclosure of non-sensitive components of the Category A Information,<sup>32</sup> I do not consider this is possible given the manner in which the *'Project Architecture'* appears within the Category A Information.

## Conclusion

35. For the reasons outlined above, I am satisfied the Category A Information meets each of the requirements identified in paragraph 27 above and that none of the exemption exceptions in schedule 3, section 10(2) of the RTI Act apply. Accordingly, I find that

---

<sup>29</sup> QPS email dated 20 February 2026.

<sup>30</sup> Third Party's submission received 29 April 2026.

<sup>31</sup> Third Party's submission received 29 April 2026.

<sup>32</sup> In the submissions received 29 April 2026, the Third Party confirmed that he sought any components of the Category A Information which comprised *'reasonably severable information that is merely high-level, descriptive, factual, generic, already publicly known, or not capable of causing the prejudice identified in the preliminary view. This may include headings, generic system categories, legends, non-sensitive labels, or other material that can be disclosed without revealing exploitable system interdependencies'*.

access to the Category A Information may be refused,<sup>33</sup> as it comprises exempt information.

## Category B Information

### Relevant law

36. Access may also be refused where the disclosure of information would, on balance, be contrary to the public interest.<sup>34</sup> 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.<sup>35</sup> 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, although there are some recognised public interest considerations that may apply for the benefit of an individual.
37. In deciding whether disclosure of information would, on balance, be contrary to the public interest, section 49 of the RTI Act requires a decision-maker to 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.
38. 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, together with all other relevant information, in reaching my decision.<sup>36</sup>

### Findings

39. I have taken no irrelevant factors<sup>37</sup> into account in making this decision.

### Analysis of public interest factors favouring disclosure and nondisclosure

40. The Third Party submitted<sup>38</sup> that a number of public interest factors arise to favour disclosure of the Category B Information, namely, where disclosure could reasonably be expected to:
  - promote open discussion of public affairs and enhance the Government's accountability<sup>39</sup>
  - contribute to positive and informed debate on important issues or matters of serious interest<sup>40</sup>
  - 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<sup>41</sup>

---

<sup>33</sup> Under section 47(3)(a) of the RTI Act.

<sup>34</sup> Sections 47(3)(b) and 49 of the RTI Act.

<sup>35</sup> Refer to Chris Wheeler, 'The Public Interest: We Know It's Important, But Do We Know What It Means' (2006) 48 *AIAL Forum* 12, 14.

<sup>36</sup> I have also kept in mind the RTI Act's pro-disclosure bias (section 44 of the RTI Act) and that access refusal grounds are to be interpreted narrowly (section 47(2)(a) of the RTI Act).

<sup>37</sup> Including the irrelevant factors identified in schedule 4, part 1 of the RTI Act.

<sup>38</sup> Third Party's submission received 29 April 2026.

<sup>39</sup> Schedule 4, part 2, item 1 of the RTI Act.

<sup>40</sup> Schedule 4, part 2, item 2 of the RTI Act.

<sup>41</sup> Schedule 4, part 2, item 3 of the RTI Act.

- ensure effective oversight of expenditure of public funds<sup>42</sup>
- allow or assist inquiry into possible deficiencies in the conduct or administration of an agency or official<sup>43</sup>
- reveal the reason for a government decision and any background or contextual information that informed the decision<sup>44</sup>
- reveal environmental or health risks or measures relating to public health and safety<sup>45</sup>
- contribute to the maintenance of peace and order;<sup>46</sup> and
- contribute to the enforcement of the criminal law.<sup>47</sup>

41. The Third Party has also explained why he considers Government accountability and transparency favour disclosure of the Category B Information. For example, the Third Party submitted:<sup>48</sup>

*.. The QAO specifically recommended that QPS evaluate system options for a fit-for-purpose Weapons Licensing Management System to ensure timely and accurate recording and transfer of firearms and licence-holder information, with more automation and better interfaces with QPRIME and, where possible, other systems such as DTMR and Queensland Health.*

*... severable information about the replacement system's documentation, status, assurance issues, high-level risks, actions, or governance treatment would not merely satisfy private curiosity. It would go to public accountability for a known public-safety reform, and to whether Queensland Government digital assurance processes were properly scrutinising a system whose deficiencies had already been identified by the Auditor-General as relevant to community safety.*

42. The information which has been disclosed to the Third Party confirms that the Category B Information:

- formed part of a Digital Economy Leaders Sub-Group Meeting Paper which is marked 'CBRC in confidence'—I also note that access to most of the content of this meeting paper was refused in the decision under review
- concerns the Weapons Licensing Management System Replacement Project (**WLMS Project**); and
- appears on a page marked 'Draft for discussion'.

43. The Queensland Government Digital Projects Dashboard<sup>49</sup> confirms that the WLMS Project remains ongoing and provides a high-level project summary—including the project's general purpose, approved expenditure and current status.<sup>50</sup>

44. I acknowledge that the replacement of QPS' current weapons licensing system is a matter of some public interest<sup>51</sup> and that the Government needs to be accountable and transparent about the manner in which it manages firearm licensing. I consider disclosing the Category B Information would inform the community about government operations

<sup>42</sup> Schedule 4, part 2, item 4 of the RTI Act.

<sup>43</sup> Schedule 4, part 2, item 5 of the RTI Act.

<sup>44</sup> Schedule 4, part 2, item 11 of the RTI Act.

<sup>45</sup> Schedule 4, part 2, item 14 of the RTI Act.

<sup>46</sup> Schedule 4, part 2, item 15 of the RTI Act.

<sup>47</sup> Schedule 4, part 2, item 18 of the RTI Act.

<sup>48</sup> Third Party's submission received 29 April 2026.

<sup>49</sup> Which can be accessed at <<https://www.qld.gov.au/digitalprojectsdashboard>>.

<sup>50</sup> For example, the Queensland Government Digital Projects Dashboard identifies that the project will 'examine system options and source and implement a replacement WLMS to enable reengineering of Weapons Licensing processes into a contemporary and streamlined operation to improve both operational and financial viability, whilst maintaining systems continuity throughout'; has an approved end date of 31 May 2027 and that QPS is progressing a 'market exercise'.

<sup>51</sup> This is reflected in media reporting about the WLMS Project.

by providing some project information in addition to what is available on the Digital Projects Dashboard. I also consider its disclosure would enable scrutiny of some of the information which the Digital Economy Leaders Sub-Group considered when reaching their project decisions. However, as this information is relatively limited in nature and would enhance Government accountability and transparency to only a limited extent, I afford low weight to the factors in schedule 4, part 2, items 1, 2, 3 and 11 of the RTI Act.

45. The Third Party has not explained how he considers disclosing the Category B Information could reasonably be expected to enliven the other public interest factors referenced in paragraph 40. I have therefore carefully reviewed the Category B Information and the Third Party's submissions. Given the particular content of the Category B Information, there is nothing before me to indicate that its disclosure could reasonably be expected to ensure effective oversight of expenditure of public funds; reveal environmental or health risks or measures relating to public health and safety; contribute to the maintenance of peace and order; or contribute to the enforcement of the criminal law. On this basis, I consider the public interest factors in schedule 4, part 2, items 4, 14, 15 and 18 of the RTI Act do not apply.
46. I have carefully considered all the factors listed in schedule 4, part 2 of the RTI Act and the parties' submissions. Having done so, and given the nature of the Category B Information, I cannot identify any other public interest considerations which favour disclosure.<sup>52</sup>
47. As I have noted above, the Category B Information forms part of the information considered by the Digital Economy Leaders Sub-Group about a project that remains ongoing. A public interest factor favouring nondisclosure will arise where disclosing information could reasonably be expected to prejudice a deliberative process of government.<sup>53</sup> The RTI Act also recognises that there is a public interest harm in disclosing an opinion, advice or recommendation that has been obtained, prepared or recorded in the course of or for the deliberative processes involved in the functions of government.<sup>54</sup> However, there are a number of exceptions to this harm factor, including (as the Third Party noted in his submissions) where information is factual or statistical information.<sup>55</sup>
48. QPS submitted that the Category B Information relates to the deliberations contained in the Digital Economy Leaders Sub-Group Meeting Paper.<sup>56</sup> In this regard, I note that, in the decision under review, DTMR refused access to those referenced deliberations—when doing so, DTMR stated that *'the premature release of deliberative information is not in the public interest'*. On the other hand, the Third Party seeks disclosure of any component of the Category B Information which does not disclose *'protected deliberative processes'*, as he considers *'factual, administrative, status, documentation, date, action, or high-level governance material should not be treated as deliberative merely because it appears in a document connected to deliberations'*.<sup>57</sup>

---

<sup>52</sup> 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 weight that I have afforded to the public interest factors that favour the nondisclosure of the Category B Information.

<sup>53</sup> Schedule 4, part 3, item 20 of the RTI Act. The Information Commissioner has previously characterised a deliberative process involved in the functions of an agency to be the agency's *'thinking processes'*. Deliberative process has also been considered as *'careful consideration with a view to decision.'*

<sup>54</sup> Schedule 4, part 4, section 4(1) of the RTI Act.

<sup>55</sup> The exceptions appear in schedule 4, part 4, sections 4(3) and (4) of the RTI Act. Additionally, schedule 4, part 4, section 4(2) of the RTI Act confirms that if the deliberative process involves public consultation the harm factor will apply only until the public consultation commences.

<sup>56</sup> QPS email dated 20 February 2026.

<sup>57</sup> Third Party's submission received 29 April 2026.

49. On the information before me, I am satisfied that the deliberative processes relating to the WLMS Project remain ongoing. In my view, it is important for agencies to retain the ability to conduct confidential discussions canvassing issues such as project concepts, structures and risks, as part of their project assessments and decision-making processes. In the circumstances of this matter, I consider disclosure of the Category B Information at the present time could have a notable, negative impact on ongoing decision-making processes for the WLMS Project. For this reason, I am satisfied disclosure of this information could reasonably be expected to lead to significant prejudice to those deliberative processes and I afford the factor in schedule 4, part 3, item 20 significant weight.
50. I am also satisfied that the Category B Information comprises advice and recommendations prepared in the course of (and for) the deliberative processes associated with the WLMS Project. Noting again the ongoing nature of the project,<sup>58</sup> I consider disclosing the Category B Information at this time will cause a significant level of harm to the project's deliberative processes. On this basis, I afford significant weight to the factor in schedule 4, part 4, section 4(1) of the RTI Act. It is arguable that a small component of the Category B Information could be characterised as factual information. However, given the manner in which the Category B Information is presented, I consider it is not reasonably possible to separate that potentially factual information from the remaining Category B Information so as to facilitate the partial disclosure requested by the Third Party.
51. As set out above, I have identified and considered the public interest factors favouring disclosure and nondisclosure which are relevant to the Category B Information.
52. For the reasons explained above, I have afforded low weight to the public interest factors relating to government accountability and transparency which favour disclosure. On the other hand, I consider that the nondisclosure factors relating to protecting the deliberative processes of government are deserving of significant weight.
53. On balance, I am satisfied that the public interest factors favouring nondisclosure of the Category B Information outweigh the factors favouring disclosure. Accordingly, I find that disclosure of the Category B Information would, on balance, be contrary to the public interest and access may be refused on that basis.<sup>59</sup>

### **Conclusion**

54. The above are the reasons for my decision set out at paragraph 1.
55. I have made this decision under section 110 of the RTI Act as a delegate of the Information Commissioner under section 145 of the RTI Act.

---

<sup>58</sup> Including the project status information accessible on the Digital Projects Dashboard.

<sup>59</sup> Under section 47(3)(b) of the RTI Act.