



Decision and Reasons for Decision

Citation: *I45 and Queensland Police Service* [2021] QICmr 65
(7 December 2021)

Application Number: 315062

Applicant: I45

Respondent: Queensland Police Service

Decision Date: 7 December 2021

Catchwords: ADMINISTRATIVE LAW - RIGHT TO INFORMATION - RIGHT TO INFORMATION - SCOPE OF APPLICATION - request for documents and communications about the applicant - whether certain information falls outside the scope of the application - section 40 of the *Information Privacy Act 2009* (Qld)

ADMINISTRATIVE LAW - RIGHT TO INFORMATION - EXEMPT INFORMATION - LAW ENFORCEMENT AND PUBLIC SAFETY INFORMATION - request for documents and communications about the applicant - whether disclosure could reasonably be expected to prejudice the effectiveness of a lawful method or procedure for preventing, detecting, investigating or dealing with a contravention or possible contravention of the law - whether access may be refused under section 67(1) of the *Information Privacy Act 2009* (Qld) and sections 47(3)(a) and 48 and schedule 3, section 10(1)(f) of the *Right to Information Act 2009*

ADMINISTRATIVE LAW - RIGHT TO INFORMATION - REFUSAL OF ACCESS - DOCUMENTS NONEXISTENT OR UNLOCATABLE - whether agency has taken all reasonable steps to locate requested documents - whether access to further documents can be refused on the ground they are nonexistent or unlocatable - section 67(1) of the *Information Privacy Act 2009* (Qld) and sections 47(3)(e) and 52(1) of the *Right to Information Act 2009* (Qld)

REASONS FOR DECISION

Summary

1. The applicant applied¹ to the Queensland Police Service (**QPS**) under the *Information Privacy Act 2009* (Qld) (**IP Act**) to access information about himself, including all information held in QPRIME².
2. QPS did not make a decision within the required statutory timeframe and was therefore taken to have made a deemed decision refusing access to the requested information.³
3. The applicant then applied to the Office of the Information Commissioner (**OIC**) for external review of QPS' deemed decision.⁴
4. QPS located relevant documents and, as part of OIC's informal resolution process,⁵ QPS disclosed some of those documents to the applicant, subject to the redaction of certain information. The applicant remains dissatisfied with the level of information released to him and has raised concerns about the adequacy of QPS' searches.
5. For the reasons set out below, I vary QPS' deemed decision and find that:
 - one page does not contain the applicant's personal information and is therefore, outside the scope of the IP Act application
 - access may be refused to all the remaining located information as it comprises exempt information;⁶ and
 - access to any further documents may be refused on the basis they do not exist or cannot be located.⁷

Background

6. The applicant requested⁸ access to the following:
 - (i) all the information on QPRIME that relates, or refers, to the applicant
 - (ii) all QPS emails that relate, or refer, to the applicant⁹
 - (iii) a QPRIME audit report showing all inquiries on the applicant on the QPRIME system¹⁰; and
 - (iv) all internal reports, intelligence reports, analyst reports, files, job logs and investigation files that relate, or refer, to the applicant within the State Crime Command.

¹ Application dated 21 August 2019 and received by QPS on 27 August 2019.

² Queensland Police Records and Information Management Exchange.

³ Under section 66(1) of the IP Act. QPS confirmed this to the applicant by letter dated 9 December 2019.

⁴ On 9 December 2019. External review by the Information Commissioner is a merits review and, under section 118(1) of the IP Act, the Information Commissioner has the power to decide any matter in relation to an application that could have been decided by the agency, under the IP Act.

⁵ Under section 103(1) of the IP Act, the Information Commissioner is required to identify opportunities and processes for early resolution and to promote settlement of external reviews.

⁶ Under section 67(1) of the IP Act and sections 47(3)(a) and 48 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.

⁷ Under section 67(1) of the IP Act and sections 47(3)(e) and 52 of the RTI Act.

⁸ Letter to QPS dated 26 September 2019. QPS subsequently confirmed this scope to the applicant on 30 October 2019, however, QPS incorrectly quoted the timeframe for (ii) as commencing on 1 January 2017.

⁹ For the period 1 July 2017 to 14 August 2019.

¹⁰ For the period 1 July 2017 to 14 August 2019.

7. On external review, the applicant raised concerns with OIC about QPS' processing of the application and what he perceived as delays in that process. The IP Act does not give OIC jurisdiction to investigate complaints about an agency's conduct or processes, or the way it has handled a particular application. Therefore, I cannot consider the applicant's concerns in this regard.
8. The applicant also raised concerns about QPS' delays in providing information and responses to OIC. Under the IP Act, the procedure to be taken on external review is, subject to the Act, at the discretion of the Information Commissioner.¹¹ I accept that the time taken to complete this review has not met the applicant's expectations. I must also acknowledge that there were significant delays in OIC receiving certain information requested from QPS and in QPS releasing the information it had agreed to disclose to the applicant. As some of those delays can be attributed to internal resourcing issues at QPS, OIC was mindful of these circumstances when issuing requests to QPS and afforded QPS multiple extensions of time to respond to OIC. However, as demonstrated in the Appendix, there were significant periods of time when OIC could not progress the review due to outstanding responses from QPS, which consequently impeded the expeditious conduct of the review.
9. The applicant also requested¹² that QPS provide him with an itemised list of the located documents (describing each document by its date, title, the part of the application to which it related and any claimed disclosure exemption). The IP Act does not require agencies to provide an applicant with a list of documents to which access has been refused.¹³ The applicant argued that, in the absence of that requested list, he has not been afforded procedural fairness and is unable to '*properly respond*' to OIC.¹⁴ I accept that some of the redactions in the partially disclosed documents do not identify the basis upon which information has been refused. However, following disclosure, OIC conveyed preliminary views to the applicant to explain the basis for the refusal of access in respect of all information which had not been disclosed and invited the applicant to provide submissions contesting the preliminary view.¹⁵ In response, the applicant has provided a number of submissions to OIC contesting the refusal of access. Accordingly, the applicant has been appraised of the basis upon which information has been refused and has been afforded a number of opportunities to put forward submissions supporting his position. In these circumstances, I am satisfied that the applicant was able to properly respond to OIC and has been afforded due process in this review.
10. The significant procedural steps taken during the external review are set out in the Appendix to this decision.

¹¹ Section 108(1)(a) of the IP Act.

¹² On 28 September 2020, the applicant requested a '*full list of documents discovered by QPS*'. The applicant reiterated this request for a list of located documents on 5 November 2020, 16 November 2020, 25 January 2021 and 22 July 2021.

¹³ Section 121 of the IP Act also requires the Information Commissioner to take necessary steps to avoid the disclosure of information that is claimed to be exempt to an access applicant. Mindful of this obligation, I consider that disclosing the document description requested by the applicant could reasonably be expected to enable the applicant to identify some of the Information in Issue.

¹⁴ Submissions dated 22 July 2021. The applicant refers to a schedule of documents set out in a decision issued by the Victorian Civil and Administrative Tribunal (VCAT) as being '*an example where certain information describing the details about the document is provided to enable the right to information applicant to properly respond to an agency's purported exemption claim*'. However, I note this referenced VCAT decision concerned information and claimed disclosure exemptions that are significantly different to those being considered in his review and that the referenced list of documents was produced for the purpose of the VCAT appeal hearing.

¹⁵ As set out in the Appendix. It is the practice of OIC to convey a preliminary view, based on an assessment of the material before the Information Commissioner or her 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 early resolution of external reviews.

Reviewable decision and evidence considered

11. The decision under review is the decision QPS is deemed to have made under section 66 of the IP Act.
12. The evidence, submissions, legislation and other material I have considered in reaching this decision are disclosed in these reasons (including footnotes and Appendix).
13. Generally, it is necessary that decision makers have regard to the *Human Rights Act 2019* (Qld) (**HR Act**), as section 11(1) of the HR Act provides that '[a]ll individuals **in Queensland** have human rights' (my emphasis). The applicant contends that, although he resides in a State other than Queensland, he is entitled to the benefit of the HR Act because 'at the relevant times' he was present in Queensland.¹⁶ On the basis of this nexus to Queensland, I have had regard to the HR Act, particularly the right to seek and receive information.¹⁷ 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 IP Act.¹⁸ I have acted in this way in making this decision, in accordance with section 58(1) of the HR Act.¹⁹

Information in Issue

14. Information on 117 pages of QPS documents remains undisclosed to the applicant and is the subject of this decision (**Information in Issue**).²⁰
15. I have examined the Information in Issue. The IP Act precludes me from describing the content of the Information in Issue in these reasons,²¹ however, I can confirm that it includes:
 - a one page document marked as 'outside scope – no applicant personal information' (**Page 35**);²² and
 - the remaining information located by QPS in response to the access application, including QPRIME records, emails and partially redacted Street Check Summaries.

Issues for determination

16. The applicant did not initially contest OIC's preliminary view that Page 35 had been validly excluded on the basis it did not contain any of his personal information.²³ However, he subsequently asserted that this document 'must have relevance' to his application.²⁴
17. It is QPS' position that the remaining Information in Issue is exempt from disclosure whereas the applicant contends that all the located documents should be disclosed to

¹⁶ Submissions dated 25 January 2021.

¹⁷ Section 21 of the HR Act.

¹⁸ *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].

¹⁹ 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*.'

²⁰ 89 full pages and portions of information redacted from 28 pages.

²¹ Section 121(3) of the IP Act, which prohibits the Information Commissioner from disclosing information that is claimed to be exempt information or contrary to the public interest information in an external review decision.

²² This document (with entire contents redacted) was included in the pages released to the applicant.

²³ Accordingly, OIC's letter dated 8 July 2021 notified the applicant that he was taken to have excluded that document from further consideration.

²⁴ Submissions dated 22 July 2021.

him in an unredacted form. The applicant has also raised a general concern that QPS has not located all relevant documents.

18. Accordingly, the issues for determination are whether:

- Page 35 can be excluded from the scope of the application on the basis it does not contain the applicant's personal information
- the remaining Information in Issue comprises exempt information to which access may be refused;²⁵ and
- access to any further information may be refused on the basis it is nonexistent or unlocatable.²⁶

19. The applicant's submissions raised the refusal to deal provision in section 59 of the IP Act. However, that provision is not an issue for determination in this review. The applicant also seeks to raise concerns beyond the jurisdiction of the Information Commissioner and which fall outside the scope of this review.²⁷ I have considered the applicant's submissions and have summarised them throughout this decision to the extent they are relevant to the issues for determination.

Relevant law

20. Under section 40 of the IP Act, an individual has a right to be given access to documents of an agency to the extent they contain the individual's personal information.²⁸ However, this right is subject to limitations, including grounds for refusal of access.²⁹

21. Access may be refused to a document to the extent it comprises exempt information³⁰ and information will qualify as exempt information where its disclosure could reasonably be expected to prejudice the effectiveness of a lawful method or procedure for preventing, detecting, investigating or dealing with a contravention or possible contravention of the law (**Exemption**).³¹ Schedule 3, section 10(2) of the RTI Act sets out certain circumstances where the Exemption will not apply.

22. Access may also be refused to a document because it is nonexistent or unlocatable.³² To be satisfied that documents are nonexistent, a decision-maker must rely on their particular knowledge and experience and have regard to a number of key factors.³³ If searches are relied on to justify a decision that the documents do not exist, all reasonable steps must be taken to locate the documents. What constitutes reasonable steps will vary from case to case, depending on which of the key factors are most relevant in the circumstances. For a document to be unlocatable, a decision-maker

²⁵ Section 67(1) of the IP Act and sections 47(3)(a) and 48 and schedule 3, section 10(1)(f) of the RTI Act.

²⁶ Section 67(1) of the IP Act and sections 47(3)(e) and 52 of the RTI Act.

²⁷ Including matters relating to QPS' processing of the application, as referenced in paragraph 7 above.

²⁸ 'Personal information' is defined in section 12 of the IP Act as 'information or an opinion, including information or an opinion forming part of a database, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion'.

²⁹ As noted above, access may be refused to information under the IP Act in the same way and to the same extent that access can be refused to information under the RTI Act (refer to section 67(1) of the IP Act).

³⁰ Sections 47(3)(a) and 48 of the RTI Act. Schedule 3 to the RTI Act identifies the types of exempt information.

³¹ Schedule 3, section 10(1)(f) of the RTI Act.

³² Sections 47(3)(e) and 52 of the RTI Act.

³³ These factors are identified in *Pryor and Logan City Council* (Unreported, Queensland Information Commissioner, 8 July 2010) (**Pryor**) at [19] as including the administrative arrangements of government; the agency structure; the agency's functions and responsibilities (particularly with respect to the legislation for which it has administrative responsibility and the other legal obligations that fall to it); the agency's practices and procedures (including but not exclusive to its information management approach); and other factors reasonably inferred from information supplied by the applicant including the nature and age of the requested document/s and the nature of the government activity to which the request relates. These factors were more recently considered in *Van Veendendaal and Queensland Police Service* [2017] QICmr 36 (28 August 2017) at [23] and *J27 and Queensland Police Service* [2021] QICmr 19 (6 May 2021) at [17].

must consider whether there are reasonable grounds for the agency to be satisfied that the requested document has been or should be in the agency's possession and whether the agency has taken all reasonable steps to find the document. In answering these questions, a decision-maker must consider the circumstances of the case and the key factors.³⁴

23. On an external review, the agency or Minister who made the decision under review has the onus of establishing that the decision was justified or that the Information Commissioner should give a decision adverse to the applicant.³⁵ However, where the issue of missing documents is raised, the applicant bears a practical onus of demonstrating that the agency has not discharged its obligation to locate all relevant documents.³⁶

Findings

Scope of IP Act application

24. Section 40 of the IP Act provides a right of access to an individual's personal information³⁷ in agency documents. Accordingly, a document will be outside the scope of an access application made under the IP Act if it does not contain any personal information of the access applicant.
25. I have examined the contents of Page 35 and am satisfied it does not contain any information about the applicant, or information from which the applicant's identity could reasonably be ascertained. Therefore, I find this document is outside the scope of the IP Act application and can be excluded from further determination on that basis.³⁸

Exemption

26. As noted above, QPS considers that all of the remaining Information in Issue comprises exempt information.
27. I have examined the remaining Information in Issue to assess whether the Exemption applies. As noted above, in these reasons, I am unable to describe this information in any detail³⁹, however, I can confirm that the document requested in part (iii) of the application is known as a QPRIME activity report and a report of this nature was located by QPS.⁴⁰ I can also confirm that remaining Information in Issue appears within documents located as relevant to other parts of the application, including information within:
- QPRIME (the database used to capture and maintain information obtained by QPS in its law enforcement functions);⁴¹ and

³⁴ Pryor at [21].

³⁵ Section 100 of the IP Act.

³⁶ See *Mewburn and Department of Local Government, Community Recovery and Resilience* [2014] QICmr 43 (31 October 2014) at [13].

³⁷ See footnote 28 for definition of 'personal information'.

³⁸ Apart from the general assertion referenced in paragraph 16, the applicant did not make any submission on this issue.

³⁹ Under section 121(3) of the IP Act, the Information Commissioner is prohibited from including information that is claimed to be exempt in a decision.

⁴⁰ As noted in previous decisions of the Information Commissioner, QPRIME activity reports generally reveal the amount of activity and the number of occasions on which QPS officers have accessed QPRIME in relation to an individual, the badge number of the inquiring officer, and includes a technical log of interactions within the database. Refer, for example, to *Kyriakou and Queensland Police Service* [2017] QICmr 30 (9 August 2017) at [30].

⁴¹ The Court of Appeal noted in *Commissioner of the Police Service v Shelton & Anor* [2020] QCA 96 at [5], that the Queensland Civil and Administrative Tribunal has previously described QPRIME as a database of information obtained by QPS in its law enforcement functions, which is a dynamic and constantly updated central record for QPS.

- records held by State Crime Command (a unit within QPS that targets serious and organised crime).
28. I am satisfied that use of the QPRIME database forms an integral part of QPS' lawful methods and procedures for preventing, detecting, investigating or dealing with contraventions, or possible contraventions, of the law. I am also satisfied that the types of records held by State Crime Command inherently include information about methods and procedures for detecting or investigating serious and organised crime, or suspected criminal behaviour.
29. The applicant submits that:
- QPS has previously disclosed QPRIME activity reports to other individuals and interstate police release audit information from their equivalent to QPRIME;⁴² and
 - disclosing this remaining Information in Issue could not reasonably be expected to prejudice any QPS method or procedure because a significant amount of information pertaining to police methods and procedures is available in the public domain.⁴³
30. When assessing whether an outcome could reasonably be expected to arise, I must distinguish *'between what is merely possible ... and expectations that are reasonably based'* and for which *'real and substantial grounds exist'*.⁴⁴ As a decision-maker conducting merits review, I am also required to determine each matter on its own facts and on the basis of available evidence at the time of making my decision—there is no requirement for me to follow the approach taken by an agency in a previous external review nor to follow the disclosure approach of interstate agencies.
31. I accept that there is a range of information in the public domain about various police methods and procedures, including what is available in the public edition of the OPM.⁴⁵ I also acknowledge the applicant's submission that he has never been arrested or charged by the QPS.⁴⁶ However, after examining the content of the Information in Issue, I am satisfied that its disclosure could reasonably be expected to prejudice particular methods and procedures used by QPS in relation to surveillance, intelligence or investigation. I am further satisfied that disclosing this particular information could reasonably be expected to reduce the effectiveness of the relevant QPS' methods and procedures which are referred to in the Information in Issue, including operation of the QPRIME system.
32. The applicant also argues that an exemption cannot be applied by the QPS to avoid scrutiny or exposure of unlawful conduct *'as indicated in schedule 3, s 10(2) of the RTI Act'*.⁴⁷ More specifically, the applicant contends that schedule 3, section 10(2)(a) of the RTI Act⁴⁸ is enlivened and raised concerns that QPS may have acted on unlawful

⁴² Submissions dated 15 January 2021.

⁴³ Submissions dated 25 January 2021 and 22 July 2021. For example, the applicant refers to sections of the QPS Operational Procedures Manual (OPM) which relate to QPS methods and procedures.

⁴⁴ *B and Brisbane North Regional Health Authority* [1994] QICmr 1 at [154]-[160] and *Williams and Queensland Police Service* [2017] QICmr 28 (4 August 2017) at [22]. Other jurisdictions have similarly interpreted the phrase *'as distinct from something that is irrational, absurd or ridiculous'*: See *Smolenski v Commissioner of Police, NSW Police* [2015] NSWCATAD 21 at [34], citing *Commissioner of Police, NSW Police Force v Camilleri (GD)* [2012] NSWADTAP 19 at [28], *McKinnon v Secretary, Department of Treasury* [2006] HCA 45 at [61] and *Attorney-General's Department v Cockcroft* (1986) 10 FCR 180 at [190].

⁴⁵ <<https://www.police.qld.gov.au/qps-corporate-documents/operational-policies/operational-procedures-manual>>.

⁴⁶ Submissions dated 15 January 2021. I also acknowledge the applicant's submission that he is not seeking this information in order to ascertain whether he is the subject of an active QPS investigation.

⁴⁷ Submissions dated 15 January 2021.

⁴⁸ Which provides that information will not be exempt where it consists of matter revealing that the scope of a law enforcement investigation has exceeded the limits imposed by law. Although schedule 3, section 10(2) of the RTI Act lists other exceptions to the exemption provisions in schedule 3, section 10(1), those other exceptions do not arise in the circumstances of this matter and are not addressed in this decision.

information and he may have been subject to unwarranted attention and improper QPRIME enquires.⁴⁹

33. On the other hand, QPS submits that the Information in Issue does not contain matter that would reveal that the scope of a law enforcement investigation has exceeded the limits imposed by law.⁵⁰
34. Having considered the Information in Issue and the submissions received from the parties, I am satisfied that this information does not consist of matter revealing that a law enforcement investigation has exceeded imposed legal limits.
35. For these reasons, I find that access may be refused to the Information in Issue as it is comprised of exempt information.⁵¹

Nonexistent or unlocatable documents

36. The functions of the Information Commissioner on external review include investigating and reviewing whether an agency has taken reasonable steps to identify and locate documents applied for by applicants.⁵²
37. As noted above, QPS located information relevant to the application during the external review process. The applicant submits that there is no evidence QPS has searched for documents pertaining to parts (iii) and (iv) of the application and there is '*information that the QPS has not supplied*'.⁵³ I acknowledge that the applicant is at a certain disadvantage as he has been refused access to 89 full pages and parts of 28 pages. As a result, he is not aware of that redacted content, thereby giving rise to concerns about whether QPS has located all relevant information. However, as noted above, an agency is not required to provide an applicant with a list describing the documents to which access has been refused. I also note that, given the way the access application is framed, some of the located documents respond to more than one part of the application.
38. To assess the reasonableness of QPS' searches, OIC sought information from QPS about the searches it conducted. QPS' response confirms that it searched its electronic records (including QPRIME, email databases and records held by State Crime Command) for information relevant to all parts of the application.⁵⁴
39. Taking into account the scope of the application, QPS' searches and the nature of the documents which were located, I consider QPS undertook comprehensive searches of locations where it would be reasonable to expect that the types of information requested in the access application would be found. I also consider that enquiries were made of relevant staff. There is nothing before me, other than the applicant's assertion, to support an expectation that further relevant documents exist.
40. For these reasons, I am satisfied that QPS has taken all reasonable steps to locate relevant information and access to any further information may be refused on the basis that it does not exist or cannot be located.⁵⁵

⁴⁹ Submissions dated 25 January 2021.

⁵⁰ Submissions dated 15 June 2021.

⁵¹ Section 67(1) of the IP Act and sections 47(3)(a) and 48 and schedule 3, section 10(1)(f) of the RTI Act.

⁵² Section 137(2) of the IP Act.

⁵³ Submission dated 25 January 2021.

⁵⁴ QPS submission dated 15 June 2021, which also confirm that these searches were conducted by officers from QPS' State Crime Command and the Ethical Standards Command Systems Audit and Investigation Unit.

⁵⁵ Section 67(1) of the IP Act and section 47(3)(e) of the RTI Act.

DECISION

41. For the reasons set out above, I vary⁵⁶ QPS' deemed decision and find that:

- Page 35 does not contain the applicant's personal information and is therefore, outside the scope of the IP Act application
- access can be refused to the Information in Issue under section 67(1) of the IP Act and section 47(3)(a) of the RTI Act as it comprises exempt information; and
- access to any further information may be refused under section 67(1) of the IP Act and section 47(3)(e) of the RTI Act on the basis it is nonexistent or unlocatable.

K Shepherd
Acting Right to Information Commissioner

Date: 7 December 2021

⁵⁶ As a delegate of the Information Commissioner, under section 139 of the IP Act.

APPENDIX

Significant procedural steps

Date	Event
9 December 2019	OIC received the external review application.
17 January 2020	OIC notified the applicant and QPS that the external review had been accepted and requested information from QPS.
3 April 2020	OIC received the requested information from QPS.
8 April 2020	OIC updated the applicant on the status of the review, and advised that OIC had received a copy of the documents QPS had located in response to his application.
22 April 2020	OIC requested further information from QPS including about its disclosure position on the located documents.
26 August 2020	QPS responded to OIC indicating that it would agree to disclose some information from the located documents.
8 September 2020	OIC asked QPS to disclose a copy of the located documents, redacted in accordance with QPS' disclosure position, to the applicant, as part of the informal resolution process. OIC updated the applicant on the status of the matter and asked him to advise OIC whether he wished to pursue access to any redacted information.
28 September 2020	The applicant advised OIC that he had not received any documents from QPS.
4 November 2020	QPS advised OIC it had sent a redacted copy of the documents, reflecting its disclosure position, to the applicant.
5 November 2020	OIC updated the applicant and asked him to identify whether there was particular information he sought to pursue.
5 and 16 November 2020	The applicant contacted OIC to identify matters he was seeking to have addressed in the review.
8 December 2020	OIC conveyed a preliminary view to the applicant and invited the applicant to provide submissions if he did not accept the preliminary view.
25 January and 1 February 2021	OIC received the applicant's submissions in response to the preliminary view.
12 February 2021	OIC requested further information from QPS, including about its searches for the requested documents. OIC provided an update to the applicant.
18 June 2021	OIC received QPS' submissions about its searches.
22 June 2021	OIC received a further submission from the applicant.
8 July 2021	OIC conveyed a further preliminary view to the applicant and invited him to provide further submissions if he did not accept the preliminary view.
22 July 2021	OIC received the applicant's further submissions in response to the preliminary view.

