



Decision and Reasons for Decision

Citation:	<i>S39 and Queensland Police Service [2023] QICmr 44 (5 September 2023)</i>
Application Number:	316784
Applicant:	S39
Respondent:	Queensland Police Service
Decision Date:	5 September 2023
Catchwords:	<p>ADMINISTRATIVE LAW - RIGHT TO INFORMATION - REFUSAL OF ACCESS - APPLICATION OUTSIDE SCOPE OF ACT - where access application requests processing documents - documents of an entity that is not subject to the Act - whether the access application is outside the scope of the RTI Act - sections 17 and 32(1)(b)(ii) and schedule 2, part 2, item 7 of the <i>Right to Information Act 2009</i> (Qld)</p> <p>ADMINISTRATIVE LAW - RIGHT TO INFORMATION - REFUSAL TO DEAL - EXEMPT INFORMATION - LAW ENFORCEMENT OR PUBLIC SAFETY INFORMATION - where access application requests access to categories of exempt information - whether an agency may refuse to deal with application - sections 40 and 48 and schedule 3, section 10(1)(f) of the <i>Right to Information Act 2009</i> (Qld)</p> <p>ADMINISTRATIVE LAW - RIGHT TO INFORMATION - REFUSAL OF ACCESS - CONTRARY TO THE PUBLIC INTEREST INFORMATION - where information include personal information of other individuals - personal information and privacy - whether disclosure of information would, on balance, be contrary to the public interest - sections 47(3)(b) and 49 of the <i>Right to Information Act 2009</i> (Qld)</p> <p>ADMINISTRATIVE LAW - RIGHT TO INFORMATION - REFUSAL OF ACCESS - DOCUMENTS NONEXISTENT OR UNLOCATABLE - SUFFICIENCY OF SEARCH - whether agency has taken all reasonable steps to locate requested documents - whether access to further documents may be refused on the basis that they are nonexistent or unlocatable - sections 47(3)(e) and 52(1) of the <i>Right to Information Act 2009</i> (Qld)</p>

REASONS FOR DECISION

Summary

1. The applicant applied¹ to Queensland Police Service (**QPS**) under the *Right to Information Act 2009* (Qld) (**RTI Act**)² for access to all documents about him from June 1969.³
2. QPS did not issue a decision within the requisite processing period and was therefore deemed to have refused access to the requested information.
3. The applicant applied to the Office of the Information Commissioner (**OIC**) for external review of QPS's deemed refusal.
4. Some documents were released to the applicant during the course of the review.⁴
5. In relation to the remaining information, for the reasons set out below, I set aside QPS's deemed refusal of access, and in substitution find that access to the requested information may be refused on the following grounds:
 - some information requested by the applicant is not subject to the RTI Act pursuant to section 32(1)(b)(ii) of the RTI Act
 - QPS was entitled to refuse to deal with some parts of the access application under section 40 of the RTI Act because those parts requested access to categories of exempt information pursuant to section 48 and schedule 3, section 10(1)(f) of the RTI Act
 - the disclosure of some information would, on balance, be contrary to the public interest pursuant to sections 47(3)(b) and 49 of the RTI Act; and
 - some information is contained in documents that do not exist or are unlocatable pursuant to sections 47(3)(e) and 52 of the RTI Act.

Reviewable decision

6. The decision under review is QPS's deemed refusal of access.

Evidence considered

7. Evidence, submissions, legislation and other material I have considered in reaching this decision are set out in these reasons (including footnotes and the Appendix). I have taken account of the numerous emails sent by the applicant during the course of the review to the extent that they contain information relevant to the issues for determination. However, the bulk of the emails complain about the delays in progressing the review, and delays in QPS releasing documents. I acknowledge the time taken to finalise the review, which was due, in part, to competing demands on OIC's resources, as well as

¹ On 18 May 2022.

² QPS asked the applicant whether he wished to have his application dealt with under the *Information Privacy Act 2009* (Qld) (**IP Act**) rather than the RTI Act as it appeared that he was requesting access to his personal information. The applicant responded by email on 21 June 2022 stating that *'The R.T.I option is identified on the basis the fullest amount of documents (?) are with this option'*. Accordingly, QPS processed the application under the RTI Act.

³ The complete terms of the access application were confirmed in a letter from the Office of the Information Commissioner to the applicant dated 19 August 2022.

⁴ By email on 8 December 2022 and 26 July 2023. QPS also agreed to give the applicant access to video footage. The applicant required access to the footage by email, however, QPS advised that the footage was too large to be emailed and would therefore need to be saved to a USB or CD and posted to the applicant. The applicant declined to provide a postal address to receive access. As QPS has complied with section 68 of the RTI Act in terms of proposing to give access to the video footage by way of providing a copy to the applicant, OIC has no jurisdiction to consider this issue of access any further. The applicant is entitled to receive access to this information upon providing QPS with a postal address or alternative suitable contact method.

the fact that this review raised a number of sufficiency of search issues that required detailed consideration.

8. I have had regard to the *Human Rights Act 2019* (Qld) (**HR Act**), particularly the right to seek and receive information.⁵ 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 and the *Information Privacy Act 2009* (Qld) (**IP Act**).⁶ I have acted in this way in making this decision, in accordance with section 58(1) of the HR Act. I also note the observations made by Bell J on the interaction between equivalent pieces of Victorian legislation:⁷ '*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.*'⁸

Issues for determination

9. The issues for determination are whether access to the requested information may be refused because:
- a) it is not subject to the RTI Act
 - b) it is exempt information
 - c) it is information the disclosure of which would, on balance, be contrary to the public interest; and/or
 - d) it is contained in documents that do not exist or are unlocatable.

Findings

Issue a)

10. In his email of 22 June 2022, the applicant stated that he sought access to all documents '*related to R.T./I.P requests including emails to the R.T.I unit*'.
11. Following the commentary contained in the decisions by His Honour Justice Hoeben of the Civil and Administrative Tribunal in the *Carmody* series of decisions,⁹ OIC has decided¹⁰ that documents received or created as part of an agency's processing of an RTI access application are documents of an entity to which the RTI Act does not apply: that is, they are documents created in connection with the exercise of the quasi-judicial functions of the Information Commissioner, which is an entity excluded from the RTI Act under schedule 2, part 2, item 7 of the RTI Act.¹¹
12. When processing an access application that contains a request to access documents that are, and are not, subject to the RTI Act, an agency is ordinarily required to draw to the attention of the applicant the defective part of the application, and give them an

⁵ Section 21(2) 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 *Freedom of Information Act 1982* (Vic) and *Charter of Human Rights and Responsibilities Act 2006* (Vic).

⁸ *XYZ* at [573].

⁹ *Carmody v Information Commissioner & Ors* (5) [2018] QCATA 18.

¹⁰ *T71 and Queensland Police Service* [2022] QICmr 10 (4 March 2022).

¹¹ See also section 14 of the RTI Act for the meaning of '*what is an agency*'; and section 17 of the RTI Act for the meaning of '*entity to which this Act does not apply*'.

opportunity to remove that part, so that the remainder of the request can be processed.¹² If the applicant declines to remove the defective part, the agency is entitled to refuse to deal with the entire application.¹³ As the decision under review is a deemed refusal, the opportunity for QPS to consult with the applicant, during the processing period, about removing his request for access to processing documents did not arise. I simply note for completeness that, had that consultation occurred, and the applicant had declined to rectify the defect in his application, it is OIC's view that QPS would have been entitled to refuse to deal with the entire application.¹⁴

13. In order to dispose of this issue on external review, I find that the applicant's request for access to processing documents may be refused under section 32(1)(b)(ii) of the RTI Act because it is a request to access documents of an entity to which the RTI Act does not apply.

Issue b)

14. The applicant applied for access to:
- *'Q.P log of all searches where my name was "run" against such systems that are in the control , or direct or indirect use of Q.P. (commonly referred to as a QPRIME¹⁵ activity report); and*
 - *'Risk rating ,or however understood, communications to and from external, police and "intelligence" organizations, including but not limited to state and federal' and 'Communications, to, from and related to myself from federal, or foreign departments entities, and/or like. Documents related to flagging as top movements travel, including Interpol or however understood (Intelligence Information).¹⁶*
15. In OIC's letter to the applicant dated 21 July 2023, the applicant was advised that it was OIC's preliminary view that it was appropriate to refuse to deal with these parts of his request under section 40 of the RTI Act because all of the requested documents would comprise exempt information under section 48 and schedule 3, section 10(1)(f) of the RTI Act: that is, their 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.
16. The applicant did not provide any relevant submissions in response to OIC's preliminary view.
17. In respect of the applicant's request for a QPRIME activity report, I am satisfied that release of this kind of information could reasonably be expected to prejudice QPS's lawful methods and procedures for preventing, detecting, investigating or dealing with a contravention or possible contravention of the law by enabling an individual to determine the level of QPS surveillance/investigation they may, or may not, be under.¹⁷ I consider that none of the circumstances set out in schedule 3, section 10(2) of the RTI Act applies

¹² The RTI Act is silent about how to deal with 'mixed' applications. Given this, OIC has prepared a Guideline to assist agencies when dealing with these types of applications: [Applications outside the scope of the Act | Office of the Information Commissioner Queensland \(oic.qld.gov.au\)](https://www.oic.qld.gov.au/applications-outside-the-scope-of-the-act).

¹³ This is because the RTI Act does not provide for an agency to make both a refusal to deal decision, and an access decision, in response to a single access application.

¹⁴ The same result occurs if an agency takes the approach set out in section 33 of the RTI Act in respect of mixed applications. That is, an application does not comply with all relevant application requirements if it asks for access to documents that are not subject to the RTI Act. Under section 33(2), the agency is required to consult with the applicant in order to give the applicant a reasonable opportunity to make the application compliant. If the applicant does not do so, the agency is entitled to refuse to deal with the entire application under section 33(6) of the RTI Act.

¹⁵ That is, the Queensland Police Records Information Management Exchange, which is QPS's information and records management system.

¹⁶ As set out in his access application.

¹⁷ See *Commissioner of the Police Service v Shelton & Anor* [2020] QCA 96.

with respect to the requested QPRIME activity report. Therefore, I find that this information is exempt information.

18. In respect of the applicant's request for Intelligence Information, I am satisfied that any collection of this type of information would also form part of QPS's methods and procedures for preventing, detecting, investigating or dealing with a contravention or possible contravention of the law, and that disclosure would prejudice this method or procedure. Dealing with a request for Intelligence Information would reveal if any intelligence had been gathered or shared by QPS (or, equally importantly, if any intelligence has not been gathered or shared). If a person is able to deduce the information QPS holds (or does not hold) about any suspected criminal activity, this, in turn, could reasonably be expected to prejudice the effectiveness of QPS's methods or procedures of investigation. Again, I consider that none of the circumstances set out in schedule 3, section 10(2) of the RTI Act applies. Therefore, I find that this information is exempt information.
19. Accordingly, I find that it was open to QPS to refuse to deal with these two parts of the access application under section 40 of the RTI Act because all of the information requested in these two categories would comprise exempt information under schedule 3, section 10(1)(f) of the RTI Act, and none of the exceptions set out in schedule 3, section 10(2) applies.

Issue c)

20. In OIC's letter to the applicant dated 21 July 2023, the applicant was advised that it was OIC's preliminary view that access to a small amount of the information in issue should be refused on the basis that its disclosure would, on balance, be contrary to the public interest. This information was redacted from the documents disclosed to the applicant by QPS on 8 December 2022.
21. The RTI Act's primary object is to give a right of access to information in the government's possession or under the government's control unless, on balance, it is contrary to the public interest¹⁸ to give access.¹⁹ The Act must be applied and interpreted to further this primary object,²⁰ and is to be administered with a pro-disclosure bias.²¹
22. Section 23 of the RTI Act gives effect to the Act's primary object, by conferring a right to be given access to documents. This right is subject to other provisions of the RTI Act,²² including grounds on which access may be refused.²³ One of these grounds (which are to be interpreted narrowly)²⁴ permits an agency to refuse access to a document to the extent the document comprises information the disclosure of which would, on balance, be contrary to the public interest.²⁵

¹⁸ The 'public interest' '...is a term embracing matters, among others, of standards of human conduct and of the functioning of government and government instrumentalities tacitly accepted and acknowledged to be for the good order of society and for the well-being of its members. The interest is therefore the interest of the public as distinct from the interests of an individual or individuals': *Director of Public Prosecutions v Smith* (1991) 1 VR 63 at [75]. The concept 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, although there are some recognised public interest considerations that may apply for the benefit of an individual: Chris Wheeler, 'The Public Interest: We Know It's Important, But Do We Know What It Means' (2006) 48 *AIAL Forum* 12, 14.

¹⁹ Section 3(1) of the RTI Act.

²⁰ Section 3(2) of the RTI Act.

²¹ Section 44 of the RTI Act.

²² Section 23(1) of the RTI Act.

²³ Section 47 of the RTI Act.

²⁴ Section 47(2)(a) of the RTI Act.

²⁵ Sections 47(3)(b) and 49 of the RTI Act.

23. The steps to be followed in determining whether disclosure of information would, on balance, be contrary to the public interest, are prescribed in section 49 of the RTI Act. In summary, a decision-maker must:
- 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.
24. Schedule 4 of the RTI Act contains non-exhaustive lists of factors that may be relevant in determining where the balance of the public interest lies in a particular case. I have taken no irrelevant factors into account in making my decision.
25. In his email of 24 July 2023, it appears that the applicant objected to a refusal of access to identifying information for police officers: *'Should you imply infer police names ,details of which are central as to events is opposed....They are paid and suspect employees of the state. Thier [sic] names and details are and remain sought ...'*. However, the refused information identifies, and is about, other private individuals and not police officers.²⁶ It comprises, for example, names, addresses, dates of birth and sensitive information provided to QPS about other persons. As such, it is the personal information²⁷ of those persons and an automatic public interest harm in disclosure arises.²⁸ There is also an associated public interest nondisclosure factor which recognises the public interest in protecting an individual's right to privacy in respect of their personal information.²⁹
26. Given the nature of the Information in Issue, and the highly sensitive context in which it appears, I would afford significant weight to each of these factors when balancing the public interest.³⁰
27. In terms of factors favouring disclosure, I recognise the general public interest in accessing government-held information and in the accountability of QPS generally for the discharge of its functions.³¹ However, given the nature of the Information in Issue, as well as the information that has already been disclosed to the applicant from the relevant pages, I am not satisfied that disclosure of the Information in Issue would advance this public interest in any significant way.
28. I also recognise the importance of the applicant obtaining access to his own personal information.³² The bulk of the Information in Issue is the personal information of other persons, and to the limited extent that any information could also properly be regarded as the personal information of the applicant, it is shared personal information. As noted, safeguarding the personal information and protecting the right to privacy of individuals are fundamental public interests that are recognised by the RTI Act and to which I attach significant weight.

²⁶ That is, information appearing on pages 8; 19; 20-22 and 26 in the first bundle of documents released to the applicant in December 2022; and images from one video recording, where passers-by appear in the footage at approximately 14:56; 20:13; 30:00 and 31:19; and the audio between approx. 41:38 and 42:05 where one of the QPS officers takes a phone call from a complainant in an unrelated matter (hereinafter referred to as the **'Information in Issue'**).

²⁷ 'Personal information' is defined in section 12 of the IP Act: *'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.'*

²⁸ See schedule 4, part 4, section 6 of the RTI Act.

²⁹ Schedule 4, part 3, item 3 of the RTI Act. The concept of *'privacy'* is not defined in either the IP Act or RTI Act. It can, however, essentially be viewed as the right of an individual to preserve their *'personal sphere'* free from interference from others (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, at paragraph 1.56).

³⁰ Some information, for example, identifies a possible suspect in the commission of an offence.

³¹ Schedule 4, part 2, item 1 of the RTI Act.

³² Schedule 4, part 2, item 7 of the RTI Act.

29. After balancing the public interest factors favouring disclosure and nondisclosure, I am satisfied that the strong public interest in protecting the personal information and right to privacy of the other individuals referred to in the Information in Issue is sufficient to outweigh the public interest in disclosure. As such, I find that access to the Information in Issue may be refused under the RTI Act because its disclosure would, on balance, be contrary to the public interest.

Issue d)

30. The applicant's access application seeks access to all documents held by QPS about him across a period of over five decades. While the applicant provided a long list of requested documents, the application itself is expressed in general terms. It lacks any specific details about the requested documents, such as identifying specific interactions with police, relevant dates, et cetera.
31. In order to try to identify any responsive documents held by QPS, OIC asked QPS to search QPRIME for any entries relating to the applicant. The located reports referred to additional identifiable documents, and so OIC requested that QPS conduct further searches for:
- body worn camera footage
 - photographs
 - traffic infringement notices; and
 - weapons licensing documents.
32. Additional documents were located as a result of these searches and were released to the applicant.
33. In terms of the other documents listed in the access application which have not been located, a 'sufficiency of search' issue arises.
34. The RTI Act permits an agency to refuse access to information where the requested information is nonexistent or unlocatable.³³
35. A document will be *nonexistent* if there are reasonable grounds to be satisfied it does not exist.³⁴ To be satisfied that a document does not exist, the Information Commissioner has previously had regard to various key factors including the agency's record-keeping practices and procedures (including, but not limited to, its information management approaches).³⁵ By considering the relevant factors, the decision maker may conclude that a particular document was not created because, for example, the agency's processes do not involve creating that specific document. In such instances, it is not necessary for the agency to search for the document. Rather, it is sufficient that the relevant circumstances to account for the nonexistent document are adequately explained by the agency.
36. The Information Commissioner may also take into account the searches and inquiries conducted by an agency in determining whether a document is nonexistent. The key

³³ Sections 47(3)(e) and 52(1) of the RTI Act.

³⁴ Section 52(1)(a) of the RTI Act. For example, a document has never been created.

³⁵ *Isles and Queensland Police Service* [2018] QICmr 27 (7 June 2018) at [15] which adopted the Information Commissioner's comments in *PDE and University of Queensland* (Unreported, Queensland Information Commissioner, 9 February 2009) (*PDE*) at [37]-[38]. *PDE* addresses the application of section 28A of the now repealed *Freedom of Information Act 1992* (Qld). Section 52 of the RTI Act is drafted in substantially the same terms as the provision considered in *PDE* and, therefore, the Information Commissioner's findings in *PDE* are relevant.

question then is whether those searches and inquiries amount to ‘*all reasonable steps*’.³⁶ What constitutes reasonable steps will vary from case to case, as the search and inquiry process an agency will be required to undertake will depend on which of the key factors are most relevant in the particular circumstances. Such steps may include inquiries and searches of all relevant locations identified after consideration of relevant key factors.³⁷

37. A document is *unlocatable* if it has been, or should be, in the agency’s possession and all reasonable steps have been taken to find it, but it cannot be found.³⁸ In determining whether a document is unlocatable, it is necessary to consider the specific circumstances of each case,³⁹ and, in particular, whether:
- there are reasonable grounds for the agency to be satisfied that the requested documents have been or should be in the agency’s possession; and
 - the agency has taken all reasonable steps to find the document.⁴⁰
38. The agency that 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.⁴¹ Where the issue of missing documents is raised on external review, the agency must demonstrate that reasonable steps have been taken to identify and locate relevant documents.⁴² If the applicant maintains further documents exist, the applicant bears a practical onus of demonstrating that the agency has not discharged its obligation. Suspicion and mere assertion will not satisfy this onus.⁴³
39. Apart from the list of documents contained in his access application, the applicant has not provided any further information that would establish reasonable grounds for expecting that additional responsive documents ought to exist, and nor has he identified any additional searches that he considers are reasonably required to be undertaken by QPS in order to locate any such documents. I note that in his email of 13 December 2022, the applicant simply stated that he sought a review ‘*that there was not complaints, disary [sic] entries, transcripts of communications, etc etc*’. He provided no further information in support of why it was reasonable to expect that such documents would exist, nor indicated what incident/s or dates they may relate to.
40. In these circumstances, the question I must consider is whether all reasonable steps have been taken to locate responsive documents. What constitutes all reasonable steps will vary from case to case, depending on the circumstances, taking into account a number of factors, including the information provided by the applicant to support the existence of responsive documents. The provision of limited detail in that respect will similarly limit the searches that can reasonably be undertaken in response.
41. In my view, the searches conducted by QPS as described above have been appropriately guided by the details contained in the access application, QPS’s record-keeping practices (such as the use of QPRIME as a primary storage facility for operational documents) and the information gleaned from the QPRIME documents that were located in the first round of searches. On the basis of the material before me, I am

³⁶ As set out in *PDE* at [49].

³⁷ As set out in *PDE* at [38].

³⁸ Section 52(1)(b) of the RTI Act. For example, a document has been lost or disposed of.

³⁹ *Pryor and Logan City Council* (Unreported, Queensland Information Commissioner, 8 July 2010) at [21]. See also, *F60XCX and Office of the Queensland Parliamentary Counsel* [2016] QICmr 42 (13 October 2016) at [84] and [87], and *Underwood and Minister for Housing and Public Works* [2015] QICmr 27 (29 September 2015) at [33]-[34] and [49].

⁴⁰ Section 52(1)(b) of the RTI Act.

⁴¹ Section 87 of the RTI Act.

⁴² Section 130(2) of the RTI Act.

⁴³ *Dubois and Rockhampton Regional Council* [2017] QICmr 49 (6 October 2017) at [36].

unable to identify any further searches or inquiries that QPS could reasonably be required to undertake.

42. Accordingly, I find that all reasonable steps have been taken to locate documents responding to the access application, and that access to further documents may be refused under sections 47(3)(e) and 52 of the RTI Act on the basis that they do not exist or cannot be located.

DECISION

43. For the reasons explained above, I set aside the decision under review. In substitution for it, I find that access to the requested information may be refused on the following grounds:

- some information requested by the applicant is not subject to the RTI Act pursuant to section 32(1)(b)(ii) of the RTI Act
- QPS was entitled to refuse to deal with some parts of the access application under section 40 of the RTI Act because those parts requested access to categories of exempt information pursuant to section 48 and schedule 3, section 10(1)(f) of the RTI Act
- the disclosure of some information would, on balance, be contrary to the public interest pursuant to sections 47(3)(b) and 49 of the RTI Act; and
- some information is contained in documents that do not exist or are unlocatable pursuant to sections 47(3)(e) and 52 of the RTI Act.

44. I have made this decision as a delegate of the Information Commissioner, under section 145 of the RTI Act.

Rachel Moss
Principal Review Officer

Date: 5 September 2023

APPENDIX**Significant procedural steps**

Date	Event
29 June 2022	OIC received the application for external review
7 July 2022	OIC received preliminary documents from QPS
19 August 2022	OIC advised the applicant that his application had been accepted
31 August 2022	OIC requested that QPS provide relevant QPRIME entries
11 October 2022	OIC received the requested information from QPS
17 October 2022	OIC requested QPS's views regarding disclosure of QPRIME information
5 November 2022	QPS provided copies of marked-up information for release to the applicant
25 November 2022	OIC requested that QPS consider disclosure of additional information
8 December 2022	QPS released information to the applicant
12 December 2022	OIC received an email from the applicant objecting to the refusal of information by QPS and complaining about the delay by QPS in releasing information
13 December 2022	OIC received an email from the applicant submitting that further responsive documents ought to exist
3 February 2023	OIC updated the applicant
6 March 2023	OIC requested that QPS conduct further searches for additional documents
3 April 2023	OIC received additional located documents and a submission from QPS objecting to the release of some information
4 April 2023	OIC requested a submission from QPS
11 April 2023	OIC received a submission from QPS
9 June 2023	OIC expressed a preliminary view to QPS
30 June 2023	OIC received a response from QPS
7 July 2023	OIC expressed a preliminary view to QPS OIC received a response from QPS
14 July 2023	OIC received additional located information from QPS
21 July 2023	OIC expressed a preliminary view to the applicant
24 July 2023	OIC received a response from the applicant
26 July 2023	QPS released information to the applicant