



Decision and Reasons for Decision

Citation:	<i>G45 and Queensland Police Service [2026] QICmr 109 (25 June 2026)</i>
Application Number:	318675
Applicant:	G45
Respondent:	Queensland Police Service
Decision Date:	25 June 2026
Catchwords:	ADMINISTRATIVE LAW – RIGHT TO INFORMATION – employment information – accountability and transparency – fair treatment – prejudice management function – contrary to public interest information – section 47(3)(b) of the <i>Right to Information Act 2009 (Qld)</i> ADMINISTRATIVE LAW – RIGHT TO INFORMATION – agency issued notice of intention to refuse to deal in relation to 1118 documents – scope narrowed on external review – a further 900 additional documents located on external review – substantial and unreasonable diversion of resources – section 60 of the <i>Information Privacy Act 2009 (Qld)</i>

DECISION

1. I vary¹ the reviewable decision² of the Queensland Police Service (**QPS**) and find that access to the remaining CTPI Information³ may be refused under section 67(1) of the IP Act and section 47(3)(b) of the *Right to Information Act 2009 (Qld)* (**RTI Act**).⁴

¹ Under section 123(1)(b) of the *Information Privacy Act 2009 (Qld)* (**IP Act**) and as a delegate of the Information Commissioner under section 139 of the IP Act.

² As set out in paragraph 7 of these reasons.

³ As defined in paragraph 14 of these reasons.

⁴ 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 IP Act and RTI Act. As the applicant's application was made before this change, the IP Act and RTI 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.

2. I also find that dealing with the application to the extent it seeks access to the Additional Documents⁵ would be a substantial and unreasonable diversion of QPS resources and accordingly, I refuse to deal with it under section 60 of the IP Act.
3. This means that there is no further information to be released to the applicant in this review. As set out in my reasons below, QPS has confirmed it is open to accepting further applications from the applicant seeking access to the Additional Documents, subject to further consultation with the applicant on narrowing the scope of any further request.
4. My reasons for the decision follow.



Katie Shepherd
Assistant Information Commissioner

Date: 25 June 2026

⁵ As defined in paragraph 12 of these reasons.

REASONS FOR DECISION

Background

5. The applicant applied⁶ to QPS under the IP Act for access to a range of information related to their employment with QPS. While dealing with the access application QPS requested an extension of time in order to finalise their searches.⁷
6. QPS located 1,118 pages responsive to the scope of the access application and subsequently issued⁸ a notice under section 61 of the IP Act advising of their intention to refuse to deal with the access application on the basis that the work involved in dealing with the application would substantially and unreasonably divert QPS resources. As part of the notice QPS provided the applicant an opportunity to narrow the terms of the application.
7. After receiving the notice, the applicant elected to seek an external review.⁹ As the access application had not been processed within the statutory timeframe, QPS was deemed to have refused access to all the requested information.¹⁰
8. On external review, QPS originally maintained its position¹¹ that processing all responsive documents would substantially and unreasonably divert its resources.
9. Following consultation with this Office (**OIC**), the applicant and QPS reached agreement as to a narrowed scope upon which the external review could be progressed (**narrowed scope**):¹²
 1. *All emails between [Officer A] and any officer regarding [complaint reference] (June–August 2024)*
 2. *All emails from [Officer B] to Human Resources regarding my employment application (October–November 2024)*
 3. *All emails from or to [an employee] (HR Executive Director) regarding position [position number] or complaint [complaint reference] (October–November 2024)*
 4. *All emails discussing compliance with Section 1.7 Complaint Resolution Guidelines or the “higher rank” requirement (June–July 2024)*
10. During consultation with OIC regarding narrowing the scope, the applicant agreed¹³ to ‘...exclude routine administrative emails I sent/received (leave applications, training requests, general correspondence) to facilitate timely processing’.
11. QPS confirmed to OIC that 168 pages (**Released Documents**) of the 1,118 pages located as part of its initial searches were responsive to the narrowed scope and these were released to the applicant¹⁴ subject to the redaction of information QPS

⁶ Access application received by QPS on 26 March 2025.

⁷ Extension of time requested until 16 June 2025.

⁸ Notice to the applicant dated 2 June 2025.

⁹ External review application dated 2 June 2025.

¹⁰ This is the reviewable decision.

¹¹ Submission from QPS dated 23 July 2025.

¹² Email dated 25 November 2025 confirming the external review would proceed on the basis of the narrowed scope.

¹³ Email from the applicant dated 16 October 2025.

¹⁴ Released to the applicant on 18 March 2026.

considered was contrary to the public interest to disclose, or out of scope. The applicant did not accept the redactions made to the Released Documents; the applicant specifically contested the removal of out of scope information as the applicant submitted¹⁵ the out of scope information was not in the nature of emails they had agreed to exclude.

12. The applicant also submitted¹⁶ that further documents should have been located within the narrowed scope. OIC requested QPS undertake further searches for documents responsive to the narrowed scope. As a result of the subsequent searches QPS identified a further, approximately, 993 pages which it considered responsive to the narrowed scope (**Additional Documents**). QPS submitted¹⁷ that dealing with these Additional Documents would be a substantial and unreasonable diversion of its resources and provided submissions to OIC in relation to the estimated resources that would be required for QPS to deal with the Additional Documents.
13. The applicant did not agree to informal settlement of the review but outlined that they remained *'ready to engage in any consultation under section 61, without narrowing the scope of my application'*.¹⁸

Issues on review

14. The issues for determination are:
 - a. whether access to information may be refused under section 67(1) of the IP Act and section 47(3)(b) of the RTI Act on the basis that disclosure would, on balance, be contrary to the public interest (**CTPI Information**);¹⁹ and
 - b. whether dealing with the application, to the extent it seeks to access to the Additional Documents, would be a substantial and unreasonable diversion of QPS resources.
15. As set out above in paragraph 11, the applicant contested the removal of out of scope information from the Released Documents on the basis that they did not consider it comprised the type of email information they had agreed to exclude. Having examined the Released Documents and the correspondence that OIC exchanged with the applicant in narrowing the scope,²⁰ I am satisfied the out of scope emails²¹ are consistent with what the applicant agreed could be excluded from consideration in the review, ie. the applicant's own emails. Therefore, that issue is not examined any further in these reasons.
16. In reaching my decision, I have taken into account evidence, submissions, legislation and other material as referred to in these reasons (including footnotes). I have had regard to the *Human Rights Act 2019* (Qld) (**HR Act**), particularly the right to seek

¹⁵ Submission dated 3 June 2026.

¹⁶ Submission dated 19 March 2026.

¹⁷ Submission dated 14 May 2026.

¹⁸ Submission dated 3 June 2026.

¹⁹ On pages 1, 2, 6–9, 64, 80–89, 91, 101–116, 129–155, 157–167.

²⁰ Correspondence dated 16 October 2025, 25 November 2025 and 17 December 2025.

²¹ On pages 2, 80, 81, 82, 88, 89, 101, 102, 108, 109, 118, 119, 129, 130, 140, 141, 156, and 157.

and receive information²² and in doing so, have acted in accordance with section 58(1) of the HR Act.²³

CTPI Information

17. I am limited²⁴ in the detail I can use to describe the CTPI Information but can say that it appears within correspondence and complaint records generally in connection with the applicant's employment. The majority relates to the personal information of other individuals (mobile phone numbers, email addresses and references to personal leave arrangements) with a limited amount of information relating to non-routine workplace complaints²⁵ and employment vetting assessment processes.

Relevant law

18. The IP Act provides individuals with a right of access to personal information held by a Queensland government agency, subject to certain limitations and grounds for refusal of access.²⁶
19. Relevantly, access to information may be refused where its disclosure would, on balance, be contrary to the public interest.²⁷ The RTI Act identifies many factors that may be relevant to deciding the balance of the public interest²⁸ and explains the steps that the decision-maker must take²⁹ in deciding the public interest as follows:
- 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 would, on balance, be contrary to the public interest.

Submissions

20. The applicant made submissions³⁰ in response to OIC's preliminary view in relation to the CTPI Information and I have considered these carefully. However, due to the amount of personal and identifying information they contain, I have not set them out in detail in these reasons but note the following key points the applicant has raised:

²² Section 21 of the HR Act.

²³ OIC's approach to the HR Act set out in this paragraph has been considered and endorsed by the Queensland Civil and Administrative Tribunal in *Lawrence v Queensland Police Service* [2022] QCATA 134 at [23].

²⁴ Section 121 of the IP Act.

²⁵ That is, complaints made about individuals other than the applicant.

²⁶ Under section 67(1) of the IP Act and section 47 of the RTI Act. Section 67 of the IP Act provides that access to information may be refused on the same grounds and to the same extent as under section 47 of the RTI Act. Section 47 of the RTI Act sets out the grounds on which access to information may be refused.

²⁷ Under sections 47(3)(b) and 49 of the RTI Act. The term *public interest* refers to considerations affecting the good order and functioning of the community and government affairs for the well-being of citizens. This means that in general, a public interest consideration is one which is common to all members of, or a substantial segment of, the community, as distinct from matters that concern purely private or personal interests. However, there are some recognised public interest considerations that may apply for the benefit of an individual.

²⁸ Schedule 4 of the RTI Act sets out the factors for deciding whether disclosing information would, on balance, be contrary to the public interest. However, this list of factors is not exhaustive.

²⁹ Section 49(3) of the RTI Act.

³⁰ Submission dated 3 June 2026.

- the disclosure factor in schedule 4, part 2, item 6 *'cannot rationally be given no weight'* as it is *'governed by the same likelihood standard'* as the factor in schedule 4, part 2, item 5 of the RTI Act
- the prejudice management function factor *'does not readily support withholding routine records of how the agency processed a complaint concerning me'*
- the administration of justice factor arises *'because the creation and use of the complaint is directly in issue in the identified proceeding'*; and
- *where a page contains the personal information of both me and a third party, the public interest harm in disclosing personal information does not apply to my own information ... and a page-level balance is required rather than treating third-party privacy as determinative across the set.*

Findings

21. In considering disclosure of the CTPI Information, I have applied the pro-disclosure bias intended by Parliament,³¹ and have not identified, nor taken into account, any irrelevant factors. My analysis of public interest factors for and against disclosure, and the balancing of those factors, is set out below.

Factors favouring disclosure

22. Based on the applicant's submissions and the nature of the CTPI Information, I am satisfied the following public interest factors favouring disclosure arise for consideration in this case:
- enhancing accountability and providing transparency to its operations and decision making³²
 - allow or assist inquiry into possible deficiencies in the conduct or administration of an agency or official³³
 - reveal or substantiate that an agency or official has engaged in misconduct or negligent, improper or unlawful conduct³⁴
 - provide an applicant with access to their own personal information³⁵
 - advance the fair treatment of individuals and other entities in accordance with the law in their dealings with agencies;³⁶ and
 - contribute to the administration of justice generally and for a person.³⁷
23. I acknowledge that some of the CTPI Information is about the applicant and I afford significant weight to the factor favouring disclosure.³⁸ However, due to the context in which the applicant's personal information appears, I must also consider factors favouring nondisclosure, and these are discussed below.

³¹ Section 58 of the IP Act.

³² Schedule 4, part 2, items 1, 3 and 11 of the RTI Act.

³³ Schedule 4, part 2, item 5 of the RTI Act

³⁴ Schedule 4, part 2, item 6 of the RTI Act

³⁵ Schedule 4, part 2, item 7 of the RTI Act.

³⁶ Schedule 4, part 2, item 10 of the RTI Act.

³⁷ Schedule 4, part 2, items 16 and 17 of the RTI Act

³⁸ Schedule 4, part 2, item 7 of the RTI Act.

24. I accept that disclosing the CTPI Information would advance QPS's accountability and transparency³⁹ in terms of how it deals with complaints and manages employment issues. I consider that it would allow the applicant to have a more complete picture of how QPS has managed issues associated with the applicant's employment and complaints, as well as understanding more of the background to QPS's decisions. I afford moderate weight to these factors taking into account the information already disclosed.
25. I also accept that disclosure of the CTPI Information could assist the applicant to inquire into possible deficiencies into QPS conduct.⁴⁰ The threshold for establishing this factor is low given it only requires a reasonable expectation of *assisting inquiry* into *possible* deficiencies in conduct. Having reviewed the CTPI Information, I afford this factor low weight. I have considered the applicant's submissions about the misconduct factor in schedule 3, part 2, item 6 of the RTI Act. Having examined the CTPI Information, I am satisfied it could not reasonably be expected to reveal the type of conduct anticipated by this factor⁴¹ and I therefore afforded it no weight.
26. Given the CTPI Information concerns decisions made in relation to the applicant's employment and taking into account the applicant's associated grievances, I am satisfied that disclosure could advance the applicant's fair treatment and contribute to the administration of justice to a moderate degree.
27. I have not identified any further factors favouring disclosure of the CTPI Information.

Factors favouring nondisclosure

28. I am satisfied the CTPI Information contains the personal information⁴² of other individuals as it identifies other QPS officers by name and also comprises information about other individuals from which their identity could be ascertained.
29. This raises two factors favouring nondisclosure, as disclosure could reasonably be expected to prejudice the protection of an individual's right to privacy and cause a public interest harm by disclosing personal information of another individual.⁴³ I note the applicant's submissions regarding further extraction of their personal information, however, having examined the CTPI Information, I consider it is intertwined to such a degree that it cannot reasonably be separated. Given the sensitive employment context in which the information appears, I afford significant weight to these two nondisclosure factors.
30. A factor favouring nondisclosure also arises where disclosure could reasonably be expected to prejudice the management function of an agency. Some of the CTPI Information is comprised of communications between managers in relation to sensitive employment matters. The Information Commissioner has previously recognised that to effectively manage staff and employment issues, agencies must

³⁹ Schedule 4, part 2, items 1, 3 and 11 of the RTI Act.

⁴⁰ This factor does not require me to find that there are deficiencies, only that disclosure could reasonably be expected to assist inquiry into *possible* deficiencies.

⁴¹ Schedule 4, part 2, items 5 and 6 of the RTI Act.

⁴² As that term is defined in section 12 of the IP Act.

⁴³ Schedule 4, part 3, item 3 and schedule 4, part 4, section 6 of the RTI Act.

be able to rely on their managers to engage openly and with candour.⁴⁴ In my view disclosing communications between managers detailing how they are dealing with sensitive staffing matters, could reasonably be expected to impede management functions in the future. Accordingly, I afford this nondisclosure factor moderate weight.

31. A further factor favouring nondisclosure arises where disclosure could reasonably be expected to prejudice a deliberative process. This factor applies to information related to the assessment and vetting process undertaken by QPS when the applicant applied for employment with QPS. In my view, disclosing information relevant to QPS's assessment could lead to individuals taking steps to circumnavigate vetting requirements, and in turn, this would prejudice QPS's ability to undertake necessary vetting processes in the future. In the circumstances, I afford this nondisclosure factor moderate weight.

Balancing the public interest

32. In balancing the public interest, I have afforded significant weight to the public interest in the applicant accessing their own personal information. I have also afforded moderate weight to enhancing the accountability and transparency of QPS, advancing the applicant's fair treatment and contributing to the administration of justice and low weight to allowing inquiry into possible deficiencies in conduct. I have afforded no weight to the misconduct factor.
33. On the other hand, I afford significant weight to protecting the privacy of other individuals and safeguarding their personal information. In the circumstances of this case, I am also satisfied that the prejudice to QPS's management function and its deliberative processes would be moderate if the CTPI Information was disclosed. On balance the nondisclosure factors are determinative. Accordingly, I find access to the CTPI Information may be refused on the basis that disclosure would be, on balance, contrary to the public interest.⁴⁵

Substantial and Unreasonable Diversion of Resources

Relevant law

34. An agency is required to deal with an access application unless doing so would, on balance, be contrary to the public interest.⁴⁶ Section 60(1) of the IP Act permits an agency to refuse to deal with an application if the agency considers the work involved in dealing with the application would, if carried out, substantially and unreasonably divert the resources of the agency from their use by the agency in the performance of its functions.
35. An agency may only refuse to deal with an application under section 60 of the IP Act if a procedural prerequisite has been met – giving the applicant an opportunity to

⁴⁴ *Gapsa and Department of Transport and Main Roads* (Unreported, Queensland Information Commissioner, 6 September 2013) at [30] to [35]

⁴⁵ Under sections 47(3)(b) and 49 of the RTI Act.

⁴⁶ Section 58(1) of the IP Act.

narrow the scope of the application, so as to re-frame it into a form that can be processed.⁴⁷ The applicant is to be given the benefit of any information an agency may be able to supply to help with this narrowing process, as far as is reasonably practicable.

36. The phrase '*substantially and unreasonably*' is not defined in the RTI Act, nor in the *Acts Interpretation Act 1954* (Qld) (**AI Act**). It is therefore appropriate to consider the ordinary meaning of these words.⁴⁸ The dictionary definitions⁴⁹ of those terms relevantly provide:

- '*substantial*' means '*of ample or considerable amount, quantity, size, etc.*'
- '*unreasonable*' means '*exceeding the bounds of reason; immoderate; exorbitant.*'

37. In deciding whether dealing with an application would substantially and unreasonably divert an agency's resources from the performance of its functions, a decision-maker must not have regard to any reasons the applicant gives for applying for access or any belief they may hold about the applicant's reasons for applying for access.⁵⁰ The decision-maker must have regard to the resources that would be used for:⁵¹

- identifying, locating or collating the documents, or
- deciding whether to give, refuse or defer access to any documents, including examining any documents or conducting third party consultations, or
- making copies or editing copies of any documents, or
- notifying any final decision on the application.

38. Assessing whether the work involved in processing a given application would, if carried out, substantially and unreasonably divert resources is a question of fact to be assessed in each individual case, taking into account a given agency's operations and resources.⁵²

39. The question of whether the impact on an agency's resources would be 'substantial' is a question of fact. In previous decisions, the Information Commissioner has held that relevant factors to consider include:⁵³

- the agency's resources and size⁵⁴
- the other functions of the agency,⁵⁵ and

⁴⁷ Section 61(1) of the IP Act.

⁴⁸ Section 14B of the AI Act.

⁴⁹ <www.macquariedictionary.com.au>

⁵⁰ Section 60(3) of the IP Act.

⁵¹ Section 60(2) of the IP Act. The word 'or' as it appears in this provision indicates that a finding of a substantial and unreasonable diversion of resources can be made on the basis of one or some of the subsections alone rather than having a cumulative effect.

⁵² *Davies and Department of Prime Minister and Cabinet* [2013] AICmr 10 (22 February 2013) at [28].

⁵³ This is not an exhaustive list.

⁵⁴ *Middleton and Building Services Authority* (Unreported, Queensland Information Commissioner, 24 December 2010) at [34]–[37].

⁵⁵ *60CDYY and Department of Education and Training* [2017] QICmr 52A (7 November 2017) at [18].

- whether and to what extent processing the application will take longer than the legislated processing period of 25 business days.⁵⁶
40. In determining whether the work involved in dealing with an application is unreasonable, it is not necessary to show that the extent of the unreasonableness is overwhelming.⁵⁷ Rather, it is necessary to weigh up the considerations for and against, and form a balanced judgement of reasonableness, based on objective evidence.⁵⁸ Factors that have been taken into account in considering this question include:⁵⁹
- whether the terms of the request offer a sufficiently precise description to permit the agency, as a practical matter, to locate the documents sought
 - the public interest in disclosure of documents
 - whether the request is a reasonably manageable one, giving due but not conclusive, regard to the size of the agency and the extent of its resources usually available for dealing with access applications
 - the agency's estimate of the number of documents affected by the request, and by extension the number of pages and the amount of officer time
 - the reasonableness or otherwise of the agency's initial assessment and whether the applicant has taken a cooperative approach in rescopings the application
 - the timelines binding on the agency
 - the degree of certainty that can be attached to the estimate that is made as to the documents affected and hours to be consumed; and in that regard, importantly whether there is a real possibility that processing time may exceed to some degree the estimate first made; and
 - whether the applicant is a repeat applicant to that agency, and the extent to which the present application may have been adequately met by previous applications.
41. The IP Act does not expressly address the procedure to be followed by the Information Commissioner before deciding to refuse to deal with an application on the ground that doing so would substantially and unreasonably divert an agency's resources from the performance of its functions. However, the Information Commissioner, or their delegate, has the power to decide any matter in relation to an application that could have been decided by the agency; and is required to identify opportunities for early resolution and to promote settlement of external review applications. The procedure to be taken is, subject to the IP Act, at the discretion of the Information Commissioner.⁶⁰

⁵⁶ *ROM212 and Queensland Fire and Emergency Services* [2016] QICmr 35 (9 September 2016) at [40].

⁵⁷ *F60XCX and Department of the Premier and Cabinet* [2016] QICmr 41 (13 October 2016) at [90].

⁵⁸ *ROM212 and Queensland Fire and Emergency Services* [2016] QICmr 35 (9 September 2016) at [42], adopting *Smeaton v Victorian WorkCover Authority (General)* [2012] VCAT 1550 (**Smeaton**) at [30].

⁵⁹ *Smeaton* at [39].

⁶⁰ Sections 103(1), 108(1)(a) and 118(1) of the IP Act

Submissions

42. On external review, QPS submitted⁶¹ that processing the Additional Documents would be a substantial and unreasonable diversion of resources, noting:

To date, the further searches undertaken in relation to the narrowed scope have identified approximately 993 pages of material ...

The process of collating and converting the material alone has already required more than 5.5 hours to place the documents into a reviewable format. Based on a preliminary assessment of the material identified, it is estimated that a minimum of 49 additional hours (3min/per page) would be required for this unit to properly review, assess, and apply any necessary redactions or exemptions to the documents. Accordingly, the narrowed scope estimated total processing time is approximately 55 hours. Having regard to the resources of both QPS and OIC involved in managing this matter, it is considered that the processing requirements associated with this narrowed scope would be an unreasonable diversion of agency resources. As there are currently 17 employees who are case managers/decision makers in our unit. Our unit has roughly 1000 current applications, which gives an estimate of 58.82 current applications per case manager (not accounting for any internal or external reviews).

Further, upon review of the documents identified, there are several factors relevant to potential nondisclosure. These include substantial amounts of personal information relating to third parties, including information associated with vetting processes and assessment considerations. The matter was also subject to an Ethical Standards complaint, and a portion of the material involves correspondence with, or oversight by, the Legal Unit. As such, some documents may contain legal professional privilege, and this office would be required to undertake consultation with the relevant unit prior to any consideration of release to the applicant or their representative.

43. The applicant made submissions contesting QPS's anticipated impact on its resourcing.⁶² In particular, the applicant submitted that exclusion of duplicate documents would serve to address QPS's concerns about 'substantial' diversion of resources and argued that 'de-duplication is QPS's own processing responsibility and requires no concession from me'.
44. The applicant also argued as follows in relation to the 'unreasonable' limb of section 60 of the IP Act.

The "unreasonable" limb is not assessed in a vacuum: section 60 is an exception to the pro-disclosure default, and what diversion is "unreasonable" must be weighed against the strength of the access interest — here, access to the applicant's own personal information and the accountability interests addressed below. The processing of a de-duplicated set, responsive to a personal-information application, is not readily characterised as an unreasonable diversion.

⁶¹ Submission dated 14 May 2026.

⁶² Submission dated 3 June 2026.

Findings

45. I am satisfied that the access application was originally framed in very broad terms and that QPS followed the process in section 61 of the IP Act to consult with the applicant on narrowing scope. I am also satisfied that during the course of the review process, reasonable attempts were made to consult with the applicant in accordance with the process set out in section 61 of the RTI Act and that this consultation led to agreement on the narrowed scope upon which the external review was ultimately progressed.
46. I accept that through QPS's original searches and searches on external review, over 2000 pages have been located.⁶³ Despite the applicant's genuine attempts to narrow the scope on external review, QPS was still required to examine the Original Documents to determine their relevance to the narrowed scope, and further, due to the applicant's submissions, raised in response to the Released Documents, QPS was required to undertake further searches which resulted in the location of the Additional Documents. To my mind, while there was agreement on the narrowed scope, given the nature of the applicant's submissions, QPS has effectively been required to revisit the original scope of the access application. I am satisfied that the estimate of 2000 responsive documents, even with duplication, is a substantial volume of documents to be dealt with in the context of a single access application (and related external review). I am further satisfied that the resources already expended and time already spent by QPS on this application have been substantial.
47. I have examined the documents located as part of QPS's initial searches and QPS's submissions on the Additional Documents, including search records. I consider it is reasonable to conclude that careful assessment of the Additional Documents would be required, to identify any information to which grounds for refusal apply, and to remove duplicated information. While I acknowledge the applicant's concerns about duplicated information, even if it was to be excluded, that process will still require use of QPS's resources to determine this issue.
48. I have taken into account that it is reasonable for an individual to seek access to their personal information from a government agency, particularly where there has been an employment relationship. However, given the surrounding circumstances, the Additional Documents will require careful assessment to ensure information about other individuals is appropriately redacted.
49. I have also taken into account QPS's estimate of 55 hours, which equates to approximately 7.5 working days. This figure includes the approximately 5.5 hours already taken to conduct the searches and collate the documents. I am satisfied that this estimate of time alone is sufficient to support a finding that further dealing with the application, to the extent it seeks access to the Additional Documents, would substantially divert QPS's resources.
50. As set out in its submission to OIC, QPS is experiencing extremely high demand for its information access services with approximately 1000 applications on hand, not

⁶³ 1,118 Original Documents and 993 Additional Documents.

including internal or external reviews.⁶⁴ I also acknowledge that QPS has a small team of 17 employees to deal with information access matters and their caseloads are very high, with approximately 60 matters per officer. I am satisfied that it is reasonable for QPS to rely on the mechanisms within section 60 and 61 of the RTI Act, to set parameters around applications as this can serve to ensure that QPS can reasonably manage its workload and deal with the high volume of applications equitably and fairly. I am further satisfied that to the extent the application seeks the Additional Documents, the work required by QPS to process those documents (on external review) would have a manifestly excessive impact on QPS's RTI resources and its ability to perform its functions, by diverting its employees from dealing with other access applications.

51. I acknowledge that obtaining information about their employment is of great importance to the applicant. However, I do not consider it would be reasonable for QPS to process a request of this magnitude, taking into account the significant number of documents involved, the estimated time it would take to examine the documents and prepare them for release, and the finite resources QPS has available to devote to processing a significant volume of information access applications.
52. I have turned my mind to the public interest in disclosure of the Additional Documents and to that end, have had regard to the submissions made by the applicant, and taken into account the content of the documents which QPS has provided to OIC in the review. While OIC did not obtain a copy of the Additional Documents from QPS, I have proceeded on the basis that those documents would contain comparable information to what is already before OIC given the nature of the employment matters to which they relate. As outlined earlier in these reasons, disclosure would provide the applicant with a greater understanding as to how certain complaints and employment processes were managed, and may to some degree, advance their fair treatment and afford procedural fairness. However, given my findings in the preceding seven paragraphs regarding the significant impact on QPS's resources, I am satisfied the public interest considerations are not sufficient to justify a finding that it would not also be an *unreasonable* diversion of QPS's resources.
53. For the reasons set out above, I refuse to deal with the application to the extent it seeks the Additional Documents as it would substantially and unreasonably divert QPS's resources from their use in performance of its functions in accordance with section 60 of the IP Act.

Conclusion

54. The above are the reasons for my decision set out at paragraphs 1 and 2.

⁶⁴ As at the date of this decision, OIC has 124 current external reviews with QPS (including this matter).