



Decision and Reasons for Decision

Citation: Q15 and Queensland Police Service [2026] QICmr 124 (10 July 2026)

Application Number: 318756

Applicant: Q15

Respondent: Queensland Health

Decision Date: 10 July 2026

Catchwords: ADMINISTRATIVE LAW – RIGHT TO INFORMATION – SCOPE OF APPLICATION – IRRELEVANT INFORMATION – whether information may be deleted on the basis it is irrelevant – section 88 of the *Information Privacy Act 2009* (Qld)

ADMINISTRATIVE LAW – RIGHT TO INFORMATION – REFUSAL OF ACCESS – EXEMPT INFORMATION – LEGAL PROFESSIONAL PRIVILEGE – whether information would be privileged from production in a legal proceeding on the ground of legal professional privilege – waiver and improper purpose – whether access to information may be refused on the basis that it is exempt – section 67(1) of the *Information Privacy Act 2009* (Qld) and sections 47(3)(a) and 48 and schedule 3, section 7 of the *Right to Information Act 2009* (Qld)

ADMINISTRATIVE LAW – RIGHT TO INFORMATION – REFUSAL OF ACCESS – CONTRARY TO PUBLIC INTEREST INFORMATION – whether disclosure would, on balance, be contrary to the public interest – section 67(1) of the *Information Privacy Act 2009* (Qld) and sections 47(3)(b) and 49 of the *Right to Information Act 2009* (Qld)

ADMINISTRATIVE LAW – RIGHT TO INFORMATION – REFUSAL OF ACCESS – NONEXISTENT OR UNLOCATABLE DOCUMENTS – 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)

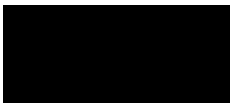
DECISION

I set aside¹ the reviewable decision of Queensland Health (**QH**) and make a decision in substitution for that decision as follows:²

- certain undisclosed information is irrelevant to the access application
- access may be refused to the remaining undisclosed information on the grounds that it comprises exempt information or its disclosure would, on balance, be contrary to the public interest; and
- access to any further documents relevant to the access application may be refused on the basis they do not exist.

This means that no further information is to be released to the applicant.

My reasons for the decision follow.



T Lake
Principal Review Officer

Date: 10 July 2026

¹ Under section 123(1)(c) of the *Information Privacy Act 2009* (Qld) (**IP Act**).

² I have made this decision as a delegate of the Information Commissioner under section 139 of the IP Act. On 1 July 2025 key parts of the *Information Privacy and Other Legislation Amendment Act 2023* (Qld) (**IPOLA Act**) came into force, effecting changes to the IP Act and *Right to Information Act 2009* (Qld) (**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.

REASONS FOR DECISION

Summary

1. The applicant applied to QH under the IP Act to access documents in the possession, or under the control, of a nominated officer which pertain to the applicant.³
2. QH refused to deal with the access application on the ground the applicant had made a previous application for the same documents.
3. The applicant then applied to the Office of the Information Commissioner (**OIC**) for external review and raised concerns about the adequacy of QH's searches.⁴
4. During the review:
 - QH accepted⁵ OIC's preliminary view that it could not refuse to deal with the access application under section 62 of the IP Act⁶
 - QH located documents relevant to the access application and disclosed some of those documents to the applicant, subject to the deletion of certain information;⁷ and
 - I conveyed a preliminary view to the applicant⁸ that the located information which was not disclosed by QH (**Information in Issue**) may be deleted or refused, on various grounds, and that QH had conducted reasonable searches for the documents requested in the access application.
5. As the applicant has not responded to the preliminary view, the review has proceeded on the basis that the applicant continues to seek access to the Information in Issue and remains concerned about the adequacy of QH's searches.

Reviewable decision and evidence considered

6. The decision under review is QH's decision dated 13 June 2025.
7. The evidence, submissions, legislation and other material I have considered in reaching my decision are set out in these reasons (including footnotes).
8. I have also had regard to the *Human Rights Act 2019* (Qld) (**HR Act**), particularly the right to seek and receive information.⁹ I consider a decision-maker will be

³ The access application was undated and was received by QH on 13 May 2025. The time periods specified for the document request were April to July 2011 and April to June 2016.

⁴ By letter dated 24 June 2025, which was received by OIC on 2 July 2025 (**External Review Application**).

⁵ On 20 February 2026.

⁶ It is the practice of OIC to convey a preliminary view, based on an assessment of the material before the Information Commissioner or their 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.

⁷ QH confirmed that documents were sent to the applicant by registered post on 5 June 2026.

⁸ By letter dated 4 June 2026.

⁹ Section 21 of the HR Act.

‘respecting and acting compatibly with’ that right and others prescribed in the HR Act, when applying the law prescribed in the RTI Act.¹⁰ I have acted in this way in making this decision, in accordance with section 58(1) of the HR Act

Information in issue

9. Although the IP Act restricts the manner in which I can describe the Information in Issue in these Reasons for Decision,¹¹ I can confirm that the information which QH redacted from the documents released to the applicant falls into the following broad categories:

- small portions of information on two pages,¹² which QH deleted as irrelevant to the access application (**Deleted Information**)
- documents and portions of information which QH deleted as exempt information—this category of information comprises communications, or parts of communications, between QH staff and QH’s internal legal advisers requesting/providing legal advice (including references to such advice requests/provided legal advice) (**Legal Communications**)¹³
- small portions of information deleted from seven pages (**Personal Circumstance Information**);¹⁴ and
- portions of public sector officer contact information, including direct telephone numbers, direct telephone extension numbers, mobile numbers and parts of email addresses (**Officer Contact Information**).

Issues for determination

10. The issues for determination are whether:

- the Deleted Information is irrelevant to the access application and may be deleted under section 88 of the IP Act
- the Legal Communications comprises exempt information and access may be refused on that ground
- disclosure of the Personal Circumstance Information and Officer Contact Information would, on balance, be contrary to the public interest and access to it may be refused on that ground; and

¹⁰ *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]. 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*’. I further note that OIC’s approach to the HR Act (as set out in this paragraph) was considered and endorsed by the Queensland Civil and Administrative Tribunal in *Lawrence v Queensland Police Service* [2022] QCATA 134 at [23] (where Judicial Member DJ McGill SC saw ‘no reason to differ’ from OIC’s position).

¹¹ Section 121 of the IP Act provides that the Information Commissioner must not, in a decision on an external review, include information that is claimed to be exempt information or contrary to the public interest information.

¹² Pages 285 and 286 of the documents released to the applicant.

¹³ This information comprises 241 pages and parts of a further five pages.

¹⁴ These portions appear on pages numbered 31, 32, 34, 37, 281, 282 and 283 in the documents disclosed to the applicant. QH deleted this information from the disclosed documents on the basis it was not relevant to the access application. By letter dated 4 June 2026, I confirmed the nature of this information to the applicant, together with my preliminary view that its disclosure would, on balance, be contrary to the public interest.

- access to further documents relevant to the access application may be refused on the ground they do not exist or cannot be located.

Deleted Information

Relevant law

11. Under the IP Act, an individual has a right to be given access to documents of a Queensland government agency, to the extent they contain the individual's personal information.¹⁵
12. Section 88 of the IP Act also permits information that is not relevant to the access application to be deleted from the document before giving access to a copy of the document. This is not a ground for refusal of access, but a mechanism to allow irrelevant information to be deleted from documents which are identified for release to an applicant.¹⁶
13. In deciding whether information is irrelevant, it is necessary to consider whether the information has any bearing upon, or is pertinent to, the terms of the relevant access application.¹⁷

Findings

14. Having carefully considered the Deleted Information and the terms of the access application, I am satisfied that the Deleted Information is not relevant to the terms of the access application (as it does not relate in any way to the applicant). Accordingly, I find that the Deleted Information has been validly deleted¹⁸ from the documents which QH disclosed to the applicant.

Legal Communications

Relevant law

15. The access right under the IP Act is subject to some limitations, including the grounds on which access to information may be refused.¹⁹ One ground of refusal is where information comprises exempt information.²⁰ Information will qualify as exempt where it would be privileged from production in a legal proceeding on the ground of legal professional privilege.²¹

¹⁵ Section 40 of the IP Act. 'Personal information' is defined in section 12 of the IP Act as 'information or an opinion, including information or an opinion forming part of a database, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion'.

¹⁶ Wyeth and Queensland Police Service [2015] QICmr 26 at [12].

¹⁷ Van Veenendaal and Queensland Police Service [2017] QICmr 36 (28 August 2017) at [12], citing with approval O80PCE and Department of Education and Training (Unreported, Queensland Information Commissioner, 15 February 2010) at [52].

¹⁸ Under section 88 of the IP Act.

¹⁹ The grounds on which access can be refused are set out in section 47 of the RTI Act. Section 67(1) of the IP Act provides that access may be refused to information in the same way and to the same extent as information may be refused under the RTI Act.

²⁰ Sections 47(3)(a) and 48 of the RTI Act. Schedule 3 of the RTI Act identifies the types of information which Parliament has determined will comprise exempt information under the RTI Act.

²¹ Schedule 3, section 7 of the RTI Act. This exemption reflects the requirements for establishing legal professional privilege at common law.

16. Legal professional privilege protects confidential communications between a lawyer and their client, made for the dominant purpose of seeking or giving legal advice or professional legal assistance, or, for use in legal proceedings either on foot or reasonably anticipated, at the time of the relevant communication.²² The privilege will extend to copies of unprivileged documents made for the dominant purpose of obtaining legal advice.²³ The privilege may also protect communications between a salaried employee legal adviser of a government department or statutory authority and his/her employer as the client (including communications through other employees of the same employer), provided there is a professional relationship of legal adviser and client, which secures to the advice an independent character, notwithstanding the employment.²⁴
17. There are qualifications and exceptions to legal professional privilege (such as waiver and improper purpose) which may affect the question of whether information attracts or remains subject to it (and, therefore, whether it comprises exempt information).²⁵

Findings

18. I am satisfied that the necessary professional relationship exists between QH (as the client) and its internal legal advisers. There is no evidence before me to indicate that these communications have been disclosed outside of the lawyer-client relationship. Having considered the content of the Legal Communications, I am also satisfied that they record confidential communications made for the dominant purpose of giving/receiving legal advice, including in respect of then ongoing legal proceedings.
19. Therefore, after careful review of the Legal Communications, I am satisfied that they meet the requirements for legal professional privilege.
20. There is no evidence before me which indicates the privilege in this information has been waived (expressly or impliedly) by QH or that any other exception to the privilege arises in this matter.

²² *Esso Australia Resources Ltd v Federal Commissioner of Taxation* (1999) 201 CLR 49 at page 73; *Daniels Corporation International Pty Ltd v Australian Competition and Consumer Commission* (2002) 213 CLR 543 at page 552. These principles were confirmed by the High Court in *Glencore International AG v Commissioner of Taxation* [2019] 265 CLR 646 at page 659–660. I note that the dominant purpose has been described as ‘the ruling, prevailing or most influential purpose’ (*Commissioner of Taxation (Cth) v Spotless Services Ltd* (1996) 186 CLR 404 at page 416) and it is to be determined objectively (refer to *AWB Limited v Cole (No 5)* (2006) 155 FCR 30 at [44], where Justice Young observed that ‘[t]he purpose for which a document is brought into existence is a question of fact that must be determined objectively.’).

²³ *Commissioner of Australian Federal Police v Propend Finance Pty Ltd* (1997) 188 CLR 501 (**Propend**) at page 509 (Brennan CJ).

²⁴ *Waterford v Commonwealth* (1987) 163 CLR 54 at 95 per Mason and Wilson JJ.

²⁵ Once a factual basis for a claim of legal professional privilege has been established, a party contending that privilege has been waived bears the onus of establishing such waiver (refer to *Sanrus Pty Ltd & Ors v Monto Coal 2 Pty Ltd & Ors* [2019] QSC 144 at [28]). Refer also to *Fletcher & Ors v Fortress Credit Corporation (Australia) II Pty Limited & Ors* [2014] QSC 303 at [61], where it was noted that a party alleging legal professional privilege does not apply for reasons of improper purpose is required to establish ‘a prima facie case’ that the relevant communications were for the purpose of facilitating alleged misconduct, or that any communication was created in furtherance of an illegal, improper or dishonest purpose. See also *Propend* at page 591.

21. For the above reasons, I find that the Legal Communications comprise exempt information and access may be refused on that ground.²⁶

Personal Circumstance Information and Officer Contact Information

Relevant law

22. Access may also be refused to information where its disclosure would, on balance, be contrary to the public interest.²⁷
23. In deciding whether disclosure of information would, on balance, be contrary to the public interest, section 49 of the RTI Act requires a decision maker to identify any irrelevant factors and disregard them; identify relevant public interest factors favouring disclosure and nondisclosure; balance the relevant factors favouring disclosure and nondisclosure; and decide whether disclosure of the information in issue would, on balance, be contrary to the public interest.
24. Schedule 4 of the RTI Act contains lists of factors that may be relevant in determining where the balance of public interest lies in a particular case. I have considered these lists, together with all other relevant information, in reaching my decision. I have also kept in mind the pro-disclosure bias of the IP Act²⁸ and that access refusal grounds are to be interpreted narrowly.²⁹

Findings

25. I have not taken any irrelevant factors into account³⁰ in reaching my decision about these components of the Information in Issue.

Analysis of public interest factors favouring disclosure and nondisclosure

26. This information appears across 30 pages. On almost all these pages, the remaining information has been disclosed to the applicant. I also note that, on the pages where the Officer Contact Information has been redacted, the names of the relevant public sector officers have been disclosed to the applicant.
27. I consider the information which has been disclosed to the applicant has substantially advanced the public interest factors concerning government accountability and transparency.³¹ Given the nature of the Personal Circumstance Information and Officer Contact Information, I do not consider disclosing this information would further advance government accountability and transparency in any meaningful way. For this reason, I afford these factors no weight.

²⁶ Under section 67(1) of the IP Act and sections 47(3)(a) and 48 of the RTI Act.

²⁷ Section 47(3)(b) 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 (although there are some recognised public interest considerations that may apply for the benefit of an individual).

²⁸ Section 64 of the IP Act.

²⁹ Section 47(2)(a) of the RTI Act.

³⁰ Including those set out in schedule 4, part 1 of the RTI Act.

³¹ Schedule 4, part 2, items 1, 3, and 11 of the RTI Act.

28. In the External Review Application, the applicant submitted that regard should be had to *'the principles of access to justice, equity before the law and the administration of justice'* and confirmed the purpose for which they had applied to access the requested documents.³² However, the applicant has provided no further information in support of these submissions.
29. Public interest factors will arise where disclosing information could reasonably be expected to:
- advance the fair treatment of individuals in accordance with the law in their dealings with agencies;³³ and
 - contribute to the administration of justice generally, including procedural fairness, or for a person.³⁴
30. Given the limited nature of the Personal Circumstance Information and Officer Contact Information, I do not consider disclosing that information could be expected to advance the applicant's fair treatment or the general administration of justice. Accordingly, I do not consider the public interest factors in schedule 4, part 2, items 10 and 16 of the RTI Act apply.
31. Based on the information before me, and taking into account the following finding in *Deemal-Hall v Office of the Director of Public Prosecutions (Deemal)*,³⁵ I do not consider the public interest factor in schedule 4, part 2, item 17 of the RTI Act applies to favour disclosure:
- In my opinion, Item 17 refers to the ordinary processes for the administration of justice for a person, and does not extend to cover the formulation of a petition to the Governor for her to exercise the prerogative of mercy.*
32. Taking into account the nature of these components of the Information in Issue, I can identify no other public interest factors which would apply to favour disclosure.³⁶

³² Namely for *'an intended application to the Governor of Queensland'*. In this regard, the applicant made reference to section 36 of the *Constitution of Queensland 2001* (Qld) and section 672A of the *Criminal Code Act 1899* (Qld).

³³ Schedule 4, part 2, item 10 of the RTI Act.

³⁴ Schedule 4, part 2, items 16 and 17 of the RTI Act. In determining whether the factor in schedule 4, part 2, item 17 of the RTI Act applies, a decision-maker must consider whether an applicant has suffered loss, damage, or some kind of wrong, in respect of which a remedy is, or may be, available under the law; the applicant has a reasonable basis for seeking to pursue the remedy; and disclosing the information held by an agency would assist the applicant to pursue the remedy, or evaluate whether a remedy is available or worth pursuing (refer to *Willsford and Brisbane City Council* (1996) 3 QAR 368 at [17]).

³⁵ [2024] QCATA 131 at [12].

³⁶ This information is not the applicant's personal information and the factor in schedule 4, part 2, item 7 of the RTI Act does not apply. I also cannot see how disclosing this information could, for example, contribute to a positive and informed debate on important issues or matters of serious interest (schedule 4, part 2, item 2 of the RTI Act); reveal this information to be incorrect, out of date, misleading, gratuitous, unfairly subjective or irrelevant (schedule 4, part 2, item 12 of the RTI Act); or contribute to the enforcement of the criminal law (schedule 4, part 2, item 18 of the RTI Act). In the event that further relevant factors exist in favour of disclosure, I am satisfied that, given the particular nature of the Personal Circumstance Information and the Officer Contact Information, there is no evidence before me to suggest that any would carry sufficient weight to outweigh the weight that I have afforded to the public interest factors that apply to favour nondisclosure.

33. The Personal Circumstance Information and Officer Contact Information comprise the personal information³⁷ of public sector officers. This gives rise to a factor favouring nondisclosure in schedule 4, part 4, section 6(1) of the RTI Act.³⁸ In determining the weight to be afforded to this factor, I have taken into account that the RTI Act does not impose any restriction on the use, dissemination or publication of information which is disclosed in response to an access application. I accept that a high level of harm would not be expected to arise from disclosure of routine personal work information of public sector officers. Accordingly, for the Officer Contact Information, I consider a low level of public interest harm could be expected to arise from its disclosure and I afford low weight to this factor. In contrast, the Personal Circumstance Information, whilst appearing in a work context, is not routine personal work information. For this reason, I consider a higher level of harm could be expected to arise from its disclosure under the RTI Act and, on that basis, I afford this factor moderate weight for the Personal Circumstance Information.
34. A public interest factor favouring nondisclosure will also arise where disclosing information could reasonably be expected to prejudice the protection of an individual's right to privacy.³⁹ I consider disclosure of the Personal Circumstance Information and Officer Contact Information could reasonably be expected to give rise to a moderate level of prejudice to the privacy of the officers about whom this information relates. In particular, I consider disclosing an officer's mobile telephone number could allow the officer to be directly contacted, including outside of business hours. On this basis, I afford this public interest factor moderate weight in favour of nondisclosure.

Conclusion

35. I have identified and considered the public interest factors which are relevant to the Personal Circumstance Information and Officer Contact Information.
36. For the reasons explained above, I have afforded no weight to the public interest factors relating to government accountability and transparency. On the other hand, for the nondisclosure factor relating to personal information, I have afforded low weight for the Officer Contact Information and moderate weight for the Personal Circumstance Information. I have also afforded moderate weight to the nondisclosure factor concerning privacy.
37. On balance, I am satisfied that the public interest factors favouring nondisclosure of these components of the Information in Issue outweigh the factors favouring disclosure. Accordingly, I find that disclosure of the Personal Circumstance

³⁷ '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'.

³⁸ It was confirmed in *Deemal* at [27] that if information meets the definition of personal information in the IP Act, the factor in schedule 4, part 4, section 6(1) of the RTI Act applies.

³⁹ Schedule 4, part 3, item 3 of the RTI Act. The concept of 'privacy' is not defined in the IP Act or the RTI Act. It can, however, essentially be viewed as the right of an individual to preserve their 'personal sphere' free from interference from others (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).

Information and Officer Contact Information would, on balance, be contrary to the public interest and access may be refused on that ground.⁴⁰

Sufficiency of search

38. As noted in paragraph 3 above, the applicant generally submitted that there was ‘*insufficiency of search*’.⁴¹ However, the applicant provided no further details, or supporting information, concerning this general submission.

Relevant law

39. On external review, the Information Commissioner’s external review functions include investigating and reviewing whether agencies have taken reasonable steps to identify and locate documents applied for by applicants.⁴² However, access to a document may be refused if it is nonexistent or unlocatable.⁴³
40. To be satisfied that a document does not exist, the Information Commissioner has previously identified key factors to consider.⁴⁴ By considering these key factors, a decision-maker may conclude that a particular document was not created. 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.
41. A simple assertion that an agency has not discharged its obligation to locate relevant documents is insufficient to discharge the practical onus which falls on an applicant where they are contesting the adequacy of an agency’s conducted searches.

Findings

42. QH provided OIC with details of the searches it undertook during the review to locate documents relevant to the access application. Those provided details (which include certifications of the conducted searches) confirm that:

⁴⁰ Section 67(1) of the IP Act and sections 47(3)(b) and 49 of the RTI Act.

⁴¹ External Review Application.

⁴² Section 130(2) of the RTI Act. In *Webb v Information Commissioner* [2021] QCATA 116 (**Webb**), it was confirmed (at [6]) that this obligation ‘*does not contemplate that [the Information Commissioner] will in some way check an agency’s records for relevant documents*’ and that, ultimately, the Information Commissioner is dependent on the agency’s officers to do the actual searching for relevant documents. The Information Commissioner also has power under section 102 of the RTI Act to require additional searches to be conducted during an external review.

⁴³ Sections 47(3)(e) of the RTI Act. A document is nonexistent if there are reasonable grounds to be satisfied the document does not exist—section 52(1)(a) of the RTI Act. 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 the document, but it cannot be found — section 52(1)(b) of the RTI Act.

⁴⁴ These factors are identified in *Pryor and Logan City Council* (Unreported, Queensland Information Commissioner, 8 July 2010) (**Pryor**) at [19], which adopted the Information Commissioner’s comments in *PDE and the University of Queensland* (Unreported, Queensland Information Commissioner, 9 February 2009) at [37]–[38] (**PDE**). They include the administrative arrangements of government; the agency’s structure; the agency’s functions and responsibilities; 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.

- QH's electronic files⁴⁵ and hard copy files were searched to locate relevant documents within the period between 1 April 2011 and 30 June 2016
 - the email records of the officer nominated in the access application (including archived email records) were specifically searched; and
 - the searches were conducted using the reference numbers specified in the access application, together with the applicant's full name and last name, as the key search terms.
43. Having reviewed the information before me (including the search information received from QH), I consider that QH has conducted appropriately targeted searches of all relevant record keeping systems for documents responsive to the access application. There is nothing before me which reasonably suggests that QH would be in possession of any further documents relevant to the access application. Accordingly, I am satisfied that QH has taken all reasonable steps to locate documents relevant to the access application and access to any further documents relevant to the access application may be refused on the ground they do not exist.⁴⁶
44. The above are the reasons for my decision set out at page 2.

⁴⁵ Which included QH's network drives, desktops, email records, teams and sharepoint.

⁴⁶ Under section 67(1) of the IP Act and sections 47(3)(e) and 52(1) of the RTI Act