



REVIEW REPORT 012-2020, 038-2020

Saskatchewan Public Safety Agency

December 17, 2020

Summary:

The Saskatchewan Public Safety Agency (SPSA) received an access to information request regarding a complaint the Applicant made to the SPSA. SPSA denied access to portions of the records pursuant to subsections 15(1)(k), 17(1)(a), 17(1)(b), and 29(1) of *The Freedom of Information and Protection of Privacy Act* (FOIP). The Commissioner found that SPSA properly applied subsection 29(1) of FOIP to some but not all portions of the records, and that it did not properly apply subsections 15(1)(k), 17(1)(a), and 17(1)(b) of FOIP to the records. The Commissioner recommended SPSA continue to release or deny access accordingly. The Commissioner also found that SPSA failed to respond to the access to information request within the legislated timeline, and could not find it conducted a reasonable search. As such, the Commissioner recommended SPSA monitor its response times to access to information requests, and that it conduct another search for records and notify the Applicant and my office of the results within 30 days of receiving the final Review Report.

I BACKGROUND

[1] On December 11, 2019, the Saskatchewan Public Safety Agency (SPSA) received an access to information request from the Applicant as follows:

Any and all information regarding my Complaint to the Public Safety Agency against the Canora Fire Department/Canora Fire Board; From November 2018 to present

[2] In a letter dated February 3, 2020, SPSA responded to the Applicant's access to information request indicating it was granting "partial access to the information requested". SPSA

denied access to portions of the records pursuant to subsections 15(1)(k), 17(1)(a), 17(1)(b), and 29(1) of *The Freedom of Information and Protection of Privacy Act* (FOIP).

[3] On March 6, 2020, the Applicant asked my office to proceed with a review of SPSA’s denial of access to portions of the records pursuant to FOIP, its failure to respond within the legislated timeline, and its search efforts.

[4] On March 9, 2020, my office notified both the Applicant and SPSA of my office’s intent to undertake a review.

II RECORDS AT ISSUE

[5] At issue are three pages, to which SPSA has applied its exemptions in the following manner:

Page Number in Record	Description	Number of Pages	Exemptions Applied
13	Emails	1	17(1)(a); 29(1)
15	Emails	1	29(1)
16	Email	1	15(1)(k); 17(1)(a); 17(1)(b)(i)

III DISCUSSION OF THE ISSUES

1. Do I have jurisdiction?

[6] SPSA is a “government institution” pursuant to subsection 2(1)(d)(ii) of FOIP. Therefore, I have jurisdiction to conduct this review.

2. Did SPSA properly apply subsection 29(1) of FOIP to the records?

[7] Subsection 29(1) of FOIP provides as follows:

29(1) No government institution shall disclose personal information in its possession or under its control without the consent, given in the prescribed manner, of the individual to whom the information relates except in accordance with this section or section 30.

[8] Subsection 29(1) of FOIP protects the privacy of individuals whose personal information may be contained within records responsive to an access to information request made by someone else. Subsection 29(1) of FOIP requires a government institution to have the consent of the individual whose personal information is in the record prior to disclosing it unless it has authority to disclose without consent pursuant to subsection 29(2) or section 30 of FOIP.

[9] When dealing with information in a record that appears to be personal information, the first step is to confirm the information indeed qualifies as personal information pursuant to section 24 of FOIP.

[10] In applying subsection 29(1) of FOIP, SPSA stated, “[t]he information withheld under this subsection contain personal information about identifiable individuals”. SPSA has applied subsection 29(1) of FOIP accordingly:

- Page 13 email dated September 23, 2019 – town of Canora administrator’s email address and signature block; email “cc” line; and
- Page 15 emails dated November 14, 2019 – town of Canora administrator’s email address and signature block; names contained on the “to” line; and, names on the email greeting line.

[11] Upon review of the records, it is apparent that SPSA redacted information of individuals functioning in their professional capacities.

[12] With respect to the town administrator’s name, email address and signature block as it appears on pages 13 and 15 of the records, I stated in Review Report 186-2019 that this

type of information is not personal information; rather, it is “business card” information or work product. In that Review Report, I described it as follows at paragraph [26]:

[26] Business card information is the type of information found on a business card (name, job title, work address, work phone numbers and work email address). This type of information is generally not personal in nature and therefore would not be considered personal information. Further, in Review Report 149-2019, 191-209 [sic], I noted that business card information does not qualify as personal information when found with work product. Work product is information generated by or otherwise associated with an individual in the normal course of performing his or her professional or employment responsibilities, whether in a public or private setting. Work product is also not considered personal information.

[13] Therefore, I find SPSA did not properly apply subsection 29(1) of FOIP to the email address and signature block of Canora’s town administrator as it appears on pages 13 and 15 of the records. I recommend SPSA release this information.

[14] With respect to the name and email address of Canora’s fire chief, their name is part of their work product and so it is not personal information. In Review Report 157-2016 concerning the Global Transportation Hub (GTH), I stated at paragraph [58] that personal email addresses used by GTH board members in the course of conducting GTH business were their personal information pursuant to subsection 24(1)(e) and (k) of FOIP, which provides as follows:

24(1) Subject to subsections (1.1) and (2), “personal information” means personal information about an identifiable individual that is recorded in any form, and includes:

...

(e) the home or business address, home or business telephone number or fingerprints of the individual;

...

(k) the name of the individual where: (i) it appears with other personal information that relates to the individual; or (ii) the disclosure of the name itself would reveal personal information about the individual.

[15] Therefore, I find SPSA did not properly apply subsection 29(1) of FOIP to the name of the fire chief as it appears on pages 13 and 15 of the records, and that it properly applied subsection 29(1) of FOIP to the fire chief’s personal email address. I recommend SPSA

release the name of the fire chief, but continue to withhold the fire chief's personal email address pursuant to subsection 29(1) of FOIP. However, as I noted in Review Report 157-2016 at paragraph [61], personal email addresses should not be used to conduct official business. The best practice is for public officials to use official email addresses to ensure the security of information, in particular, personal information of citizens.

3. Did SPSA properly apply subsection 17(1)(a) of FOIP to the records?

[16] Subsection 17(1)(a) of FOIP provides as follows:

17(1) Subject to subsection (2), a head may refuse to give access to a record that could reasonably be expected to disclose:

(a) advice, proposals, recommendations, analyses or policy options developed by or for a government institution or a member of the Executive Council;

[17] Subsection 17(1)(a) of FOIP is a discretionary class-based exemption. It permits refusal of access in situations where release of a record could reasonably be expected to disclose advice, proposals, recommendations, analyses or policy options developed by or for a government institution or a member of the Executive Council.

[18] The two-part test for subsection 17(1)(a) of FOIP, which can be found in the *Guide to FOIP, Chapter 4* (updated February 4, 2020) (Guide to FOIP) at page 120, is as follows:

1. Does the information qualify as advice, proposals, recommendations, analyses or policy options?
2. Was the advice, proposals, recommendations, analyses and/or policy options developed by or for a government institution or a member of the Executive Council?

[19] SPSA applied subsection 17(1)(a) of FOIP to the records as follows:

- On page 13 to a portion of the email dated October 15, 2019; and
- On page 16, to a portion of the email dated November 21, 2019. I note SPSA also applied subsections 15(1)(k) and 17(1)(b)(i) of FOIP to this same portion.

1. Does the information qualify as advice, proposals, recommendations, analyses or policy options?

[20] Regarding its reliance on subsection 17(1)(a) of FOIP to these portions of the records, SPSA stated as follows:

The record contains information surrounding a law enforcement matter where advice is being provided to SPSA regarding the matter.

[21] *Advice* is guidance offered by one person to another. It can include the analysis of a situation or issue that may require action and the presentation of options for future action, but not the presentation of facts. Advice encompasses material that permits the drawing of inferences with respect to a suggested course of action, but which does not itself make a specific recommendation. It can be an implied recommendation. The “pros and cons” of various options also qualify as advice. It should not be given a restricted meaning. Rather, it should be interpreted to include an opinion that involves exercising judgement and skill in weighing the significance of fact. It includes expert opinion on matters of fact on which a government institution must make a decision for future action. It also includes the views or opinions of a public servant as to the range of policy options to be considered by the decision maker even if they do not include a specific recommendation on which option to take. Advice has a broader meaning than recommendations. The legislative intention was for advice to have a distinct meaning from recommendations. Otherwise, it would be redundant. While “recommendation” is an express suggestion, “advice” is simply an implied recommendation (Guide to FOIP, page 120).

[22] Upon review of the email dated October 15, 2019, on page 13 of the record, it is not apparent to me how the information in question constitutes *advice* for the purposes of subsection 17(1)(a) of FOIP. Rather, the information in this portion appears to contain an opinion held about the Applicant, which is the Applicant’s personal information pursuant to subsection 24(1)(h) of FOIP, which provides as follows:

24(1) Subject to subsections (1.1) and (2), “personal information” means personal information about an identifiable individual that is recorded in any form, and includes:

...

(h) the views or opinions of another individual with respect to the individual;

[23] Therefore, the first part of the test is not met. I find SPSA did not properly apply subsection 17(1)(a) of FOIP to the email dated October 15, 2019, on page 13 of the record and recommend SPSA release this information, particularly in light of the fact that it is the Applicant's personal information pursuant to subsection 24(1)(h) of FOIP. The Applicant has a right of access to such information pursuant to subsection 31(1) of FOIP, which provides as follows:

31(1) Subject to Part III and subsection (2), an individual whose personal information is contained in a record in the possession or under the control of a government institution has a right to, and:

(a) on an application made in accordance with Part II; and

(b) on giving sufficient proof of his or her identity;

shall be given access to the record.

[24] With respect to the email dated November 21, 2019, on page 16, the portion of the email to which the Applicant was provided access indicates the email is in regards to a meeting by the Canora Fire Board. The portion withheld from the Applicant contains three sentences, which I will discuss separately as follows:

- The first sentence appears to be a statement of fact regarding the Applicant, which is not contemplated by subsection 17(1)(a) of FOIP. I further note this information would also be the Applicant's personal information pursuant to subsection 24(1)(h) of FOIP.
- The second sentence appears to relay an opinion the board has about the matter at hand, but not within the context of providing *advice* about the matter or a considered action.
- The third sentence does not appear to contain *advice* where an action is being considered. Rather, this sentence appears to contain information regarding an action already taken by the board.

[25] Therefore, the first part of the test is not met and I find SPSA did not properly apply subsection 17(1)(a) of FOIP to the email dated November 21, 2019, on page 16 of the

record. As the first sentence described in the preceding paragraph contains the Applicant's personal information, I recommend SPSA release this information as it is the Applicant's personal information pursuant to subsection 24(1)(h) of FOIP and they have a right of access pursuant to subsection 31(1) of FOIP. I will consider the second and third sentences as described in the preceding paragraph pursuant to subsection 17(1)(b) of FOIP.

4. Did SPSA properly apply subsection 17(1)(b) of FOIP to the records?

[26] Subsection 17(1)(b) of FOIP provides as follows:

17(1) Subject to subsection (2), a head may refuse to give access to a record that could reasonably be expected to disclose:

...

(b) consultations or deliberations involving:

(i) officers or employees of a government institution;

(ii) a member of the Executive Council; or

(iii) the staff of a member of the Executive Council;

[27] Subsection 17(1)(b) of FOIP is a discretionary class-based exemption. It permits refusal of access in situations where release of a record could reasonably be expected to disclose consultations or deliberations involving officers or employees of a government institution, a member of the Executive Council or the staff of a member of the Executive Council. The provision is intended to allow persons having the responsibility to make decisions to freely discuss the issues before them in order to arrive at well-reasoned decisions. The intent is to allow such persons to address an issue without fear of being wrong, looking bad, or appearing foolish if their frank deliberations were to be made public.

[28] The two-part test for subsection 17(1)(b) of FOIP, found in the Guide to FOIP at page 127, is as follows:

1. Does the record contain consultations or deliberations?

2. Do the consultations or deliberations involve officers or employees of a government institution, a member of the Executive Council, or the staff of a member of the Executive Council?

[29] I need to consider SPSA's application of subsection 17(1)(b) of FOIP to the email dated November 21, 2019 on page 16. As I have already determined that the first sentence in this portion of the record contains the Applicant's personal information pursuant to subsection 24(1)(h) of FOIP, I only need to consider SPSA's application of subsection 17(1)(b) of FOIP to the second and third sentences as I have outlined at paragraph [24] of this Report.

1. Does the record contain consultations or deliberations?

[30] With respect to its reliance on subsection 17(1)(b) of FOIP on this portion of the record, SPSA stated the following:

For this exemption to apply, the consultations or deliberations would involve officers or employees of a government institution.

The section of the email withheld under this subsection relate to advice provided by a government employee.

[31] *Consultation* means the action of consulting or taking counsel together; a deliberation or conference in which the parties consult and deliberate. A consultation can occur when the views of one or more officers or employees of a government institution are sought as to the appropriateness of a particular proposal or suggested action. It can include consultations about prospective future actions and outcomes in response to a developing situation. It can also include past courses of action. For example, where an employer is considering what to do with an employee in the future, what has been done in the past can be summarized and would qualify as part of the consultation or deliberation (Guide to FOIP, pages 127 to 128).

[32] *Deliberation* means the action of deliberating (to weigh in mind; to consider carefully with a view to a decision; to think over); or, careful consideration with a view to a decision. It can include the consideration and discussions of the reasons for and against a measure by

a number of councilors. A deliberation can occur when there is a discussion or consideration of the reasons for or against an action. It can refer to discussions conducted with a view towards making a decision (Guide to FOIP, page 128).

[33] Upon review of the two sentences in question, as described at paragraph [24] of this Report, I am not able to conclude that either are part of a consultation or deliberation. As I have noted, it appears to involve actions that have already occurred or that have been taken; as such, a consultation or deliberation would likely have occurred prior to those actions. As such, the first part of the test has not been met, and I find SPSA did not properly apply subsection 17(1)(b) of FOIP to the second and third sentences of the email dated November 21, 2019 on page 16 of the record. I will now consider SPSA's application of subsection 15(1)(k) of FOIP to these two sentences.

5. Did SPSA properly apply subsection 15(1)(k) of FOIP to the records?

[34] Subsection 15(1)(k) of FOIP provides as follows:

15(1) A head may refuse to give access to a record, the release of which could:

...

(k) interfere with a law enforcement matter or disclose information respecting a law enforcement matter;

[35] Subsection 15(1)(k) of FOIP is a discretionary exemption that contains both a class and harm-based component. It permits refusal of access in situations where release of a record could interfere with a law enforcement matter or disclose information respecting a law enforcement matter.

[36] The two-part test for subsection 15(1)(k) of FOIP, which can be found in the Guide to FOIP at page 74, is as follows:

1. Is there a law enforcement matter involved?

2. Does one of the following exist; a) Could release of the information interfere with a law enforcement matter; or, b) Could release disclose information with respect to a law enforcement matter?

[37] SPSA applied subsection 15(1)(k) of FOIP to the second and third sentences as I have outlined at paragraph [24] of this Report. I have already found that subsections 17(1)(a) and (b) of FOIP do not apply to these two sentences.

[38] In support of its application of subsection 15(1)(k) of FOIP, SPSA stated the following:

For this exemption to apply, release of the record could interfere with a law enforcement matter or disclose information respecting a law enforcement matter.

The record contains information surrounding a law enforcement matter.

1. Is there a law enforcement matter involved?

[39] *Law enforcement* includes policing, which refers to the activities of police services. This means activities carried out under the authority of a statute regarding the maintenance of public order, detection and prevention of crime or the enforcement of law. *Law enforcement* can also include investigations, inspections or proceedings carried out under the authority of or for the purpose of enforcing an enactment. The law enforcement matter does not need to be active or ongoing (Guide to FOIP, pages 74 to 75).

[40] SPSA has not elaborated on what matter was being investigated, or how it qualified as a law enforcement matter. They have also not stated under which authority an investigation occurred or is occurring. In a part of the record SPSA released to the Applicant, there is a letter that appears to have been written by the Assistant Deputy Commissioner for SPSA that states the following:

After speaking to all parties there does not seem to be any evidence of wrong doing by the Canora Fire Department relating to the events of [date].

...

It is our understanding from speaking to all parties that the RCMP have been notified of this and the previous complaints and as such no further action is required by OFC on this matter.

[41] Other than the preceding, from reviewing portions of the record SPSA released to the Applicant, it appears the Applicant made complaints to the RCMP regarding the Canora Fire Department. A portion of a letter the Applicant appears to have sent to the Assistant Deputy Commissioner for SPSA states the following:

Following is a brief recap [sic] of the information I provided:

...

- Several members of the Fire Department have substantial history of violations involving off-road vehicles (some involving children), as well as some criminal behavior, all duly reported to the RCMP;

[42] Based on what has been provided by SPSA, I find that the first part of the test is not met. As such, I find SPSA did not properly apply subsection 15(1)(k) of FOIP to the second and third sentences as I have outlined at paragraph [24] of this Report. As I have found SPSA did not properly apply subsections 17(1)(a) and (b), and 15(1)(k) of FOIP to the second and third sentences as I have outlined at paragraph [24] of this Report, I recommend SPSA release these two sentences.

6. Did SPSA conduct a reasonable search for records?

[43] Upon receiving their response from SPSA, the Applicant stated, “[w]ile there are numerous records for the last 2 categories, there are no records regarding the lead-up to the Feb 2019 investigation ("Investigation"), and only one brief record regarding the Investigation itself”. The Applicant went on to indicate what they felt were the following missing records:

- some of my own records, such as video & audio evidence;
- records from [Assistant Deputy Commissioner] to anyone (observation: [they] must have communicated with SPSA members, and possibly others in civil service, and/or government);
- records from SPSA staff to [Assistant Deputy Commissioner] prior to the Investigation, either acknowledging receipt of my complaint, assessing my complaint, arranging Investigation, etc. (observation: this is inconsistent with the fact that there are several emails to [Assistant Deputy Commissioner] regarding

Canora Fire Board meeting arrangements in late 2019, which was far less important than the Investigation itself);

- records between SPSA and Canora Fire Board regarding the Investigation, which involved numerous people on both sides (observation: again, this is inconsistent with the fact that there are several emails between SPSA and Canora Fire Board regarding Board meeting arrangements in late 2019);
- assessment by SPSA regarding my evidence (other than extremely brief mention page 17);
- audio/transcript/notes of my statement to SPSA on Feb 19 2019;
- audio/transcript/notes of other interviewee statements to SPSA on Feb 19 2019;
- assessment by SPSA regarding statements made by 4 interviewees (other than extremely brief mention on page 17);
- written or electronic logging records by SPSA (eg: daytimer, phone records, etc); and
- other information which I do not know exists, or could exist;

[44] Section 5 of FOIP provides as follows:

5 Subject to this Act and the regulations, every person has a right to and, on an application made in accordance with this Part, shall be permitted access to records that are in the possession or under the control of a government institution.

[45] Section 5 of FOIP is clear that access to records must be granted if they are in the possession or under the control of the government institution subject to any exemptions that may apply pursuant to FOIP.

[46] Government institutions must grant access to records in their possession or control subject to any exemptions in Parts III and IV of FOIP. If a government institution indicates that records do not exist, an applicant may request my office conduct a review of the government institution's search efforts. FOIP does not require a government institution to prove with absolute certainty that records do not exist, but it must demonstrate that it has conducted a reasonable search to locate the records.

[47] A reasonable search is one in which an employee, experienced in the subject matter, expends a reasonable effort to locate records reasonably related to the access to information request. A reasonable effort is the level of effort you would expect of any fair, sensible person searching areas where records are likely to be stored. What is reasonable depends

on the request and related circumstances. Examples of information to support its search efforts that government institutions can provide to my office include the following:

- If personal information is involved, explain how the individual is involved with the government institution (e.g. current or former employee), and why certain branches or departments were searched;
- For general requests, tie the subject matter of the request to the department, branch, etc., involved. In other words, explain why certain areas were searched and not others;
- Identify the employees involved in the search and how they are experienced in the subject matter;
- Explain how the paper and/or records management systems are organized in the departments, branches, etc., involved in the search. Explain how records are classified, for example, if they are organized by alphabet, year, function or subject. Consider providing a copy of your organization's record schedule and/or destruction certificates. Consider how you have considered off-site records, records in possession of a third party but in the government institution's control, and mobile devices (e.g. laptops, smartphones and tablets);
- Explain the folders searched and how the folders link back to the subject matter requested; and
- Include on what dates employees searched and how long it took for each to search. Include the results of the search. Consider having employees provide affidavits to support a position that a record searched for does not exist, or to support the details provided.

[48] The preceding list is intended to be a guide. Each case will require different search strategies and details depending on the records requested.

[49] In this matter, the Applicant's request for access to information is specific to a complaint they made to SPSA about the Canora Fire Department for the time period November 2018 to present. The Applicant also cites a substantial list of records they feel have not been included in SPSA's response.

[50] In its submission, SPSA stated, "December 17, 2019 a request was sent out for all information dealing with the Canora Fire Department or [name of Applicant]. Notes,

letters, etc., from meetings, phone calls, etc. were requested”. SPSA did not provide more detail than this and, in its submission, did not directly address its search efforts or the records queried by the Applicant as outlined in my office’s notification on March 9, 2020.

[51] I note that my office’s notification of March 3, 2020, provided SPSA with information on what constitutes a reasonable search. In an email dated September 22, 2020, after being several months late providing its submission, my office reiterated what constitutes a reasonable search, and the detail my office requires to analyze a government institution’s search efforts.

[52] As SPSA has not provided details regarding its search efforts, I cannot find it conducted a reasonable search for records. I recommend SPSA conduct another search for records and provide details of its search to my office and the Applicant within 30 days of receiving the final version of this Report. If additional records are located, SPSA should indicate whether it will be releasing the records to the Applicant or if it will be withholding the records in accordance with a particular exemption in Parts III and/or Part IV of FOIP.

7. Did SPSA meet the legislated timeline?

[21] Subsection 7(2) of FOIP requires a government institution to respond to an applicant within 30 calendar days of receiving an access to information request. Section 7(2) of FOIP provides as follows:

7(2) The head shall give written notice to the applicant within 30 days after the application is made:

(a) stating that access to the record or part of it will be given on payment of the prescribed fee and setting out the place where, or manner in which, access will be available;

(b) if the record requested is published, referring the applicant to the publication;

(c) if the record is to be published within 90 days, informing the applicant of that fact and of the approximate date of publication;

(d) stating that access is refused, setting out the reason for the refusal and identifying the specific provision of this Act on which the refusal is based;

(e) stating that access is refused for the reason that the record does not exist;

(f) stating that confirmation or denial of the existence of the record is refused pursuant to subsection (4); or

(g) stating that the request has been disregarded pursuant to section 45.1, and setting out the reason for which the request was disregarded.

[53] In terms of calculating the due date, *The Legislation Act* establishes general rules that govern the interpretation of all statutory instruments in the province. Section 2-28 of *The Legislation Act* provides guidance on the computation of time and can be applied to the 30-day calculation as follows:

- The first day the access request is received is excluded in the calculation of time;
- If the due date falls on a holiday, the time is extended to the next day that is not a holiday; and
- As FOIP expresses the time in number of days, this is interpreted as 30 calendar days, not business days.

[54] SPSA received the Applicant's access to information request on December 11, 2019, and provided its section 7 response to the Applicant on February 3, 2020. The 30th day to respond in this circumstance would have been January 10, 2020. Pursuant to subsection 7(2) of FOIP, SPSA failed to provide its response to the Applicant within the 30-day statutory timeline. I find, therefore, that SPSA did not meet the legislated timeline pursuant to subsection 7(2) of FOIP. I recommend SPSA monitor its response times to access to information requests to ensure it is in compliance with subsection 7(2) of FOIP.

IV FINDINGS

[55] I find SPSA did not properly apply subsection 29(1) of FOIP to the email address and signature block of Canora's town administrator, and to the Canora fire chief's name, as they appear on pages 13 and 15 of the records, and that it did properly apply subsection

29(1) of FOIP to the Canora fire chief's personal email address on pages 13 and 15 of the records.

[56] I find SPSA did not properly apply subsection 17(1)(a) of FOIP to the email dated October 15, 2019, on page 13 of the record.

[57] I find SPSA did not properly apply subsections 17(1)(a), 17(1)(b) and 15(1)(k) of FOIP to the email dated November 21, 2019, on page 16 of the record.

[58] I find the emails dated October 15, 2019, on page 13 and November 21, 2019, on page 16, as I have identified at paragraphs [23] and [25] of this Report, contain the Applicant's personal information pursuant to subsection 24(1)(h) of FOIP, and that they have a right of access to this information pursuant to subsection 31(1) of FOIP.

[59] I cannot find SPSA conducted a reasonable search for records.

[60] I find SPSA did not meet its legislated timelines pursuant to subsection 7(2) of FOIP.

V RECOMMENDATIONS

[61] I recommend SPSA release the email address and signature block of Canora's town administrator, and the name of Canora's fire chief.

[62] I recommend SPSA continue to withhold the personal email address of Canora's fire chief pursuant to subsection 29(1) of FOIP.

[63] I recommend SPSA release the information from the email dated October 15, 2019, on page 13 of the record where it applied subsection 17(1)(a) of FOIP.

[64] I recommend SPSA release the information from the email dated November 21, 2019 on page 16 of the records where it applied subsections 17(1)(a), 17(1)(b) and 15(1)(k) of FOIP.

- [65] I recommend SPSA release the Applicant's personal information to them as I have identified at paragraphs [23] and [25] of this Report.
- [66] I recommend SPSA conduct another search for records and provide details of its search to my office and the Applicant within 30 days of receiving the final version of this Report. If additional records are located, SPSA should indicate whether it will be releasing the records to the Applicant or if it will be withholding the records in accordance with a particular exemption in Parts III and/or Part IV of FOIP.
- [67] I recommend SPSA monitor its response times to access to information requests to ensure it is in compliance with subsection 7(2) of FOIP.

Dated at Regina, in the Province of Saskatchewan, this 17th day of December, 2020.

Ronald J. Kruzeniski, Q.C.
Saskatchewan Information and Privacy
Commissioner