



## **REVIEW REPORT 124-2015**

### **Saskatchewan Police Commission**

**February 2, 2016**

#### **Summary:**

The Applicant submitted a request for emails regarding an investigation. The Saskatchewan Police Commission (SPC) responded to the Applicant advising that they would be extending the response period pursuant to subsection 12(1)(a)(ii) and 12(1)(b) of *The Freedom of Information and Protection of Privacy Act* (FOIP). SPC then responded to the Applicant's request releasing portions of the responsive records. SPC withheld portions of the records pursuant to subsections 29(1), 13(1)(a), 16(1)(a) and 17(1)(a) of FOIP, as well as subsection 27(1) of *The Health Information Protection Act* (HIPA). In SPC's submission, it also applied subsections 15(1)(c), 15(1)(e), 15(1)(f), 15(1)(k), 15(1)(m), 17(1)(b)(i), 17(1)(b)(ii) and 22 of FOIP to withhold the remaining portions of the record. It was found that SPC had appropriately applied a time extension to the response, the search for records was reasonable and some portions of the records had been appropriately withheld. SPC released the pages to the Applicant where the exemptions were found not to apply. It is recommended that SPC take no further action regarding this matter.

#### **I BACKGROUND**

[1] On December 23, 2014, the Applicant submitted an access to information request to the Ministry of Justice (Justice). The request was for the following:

Any and all emails pertaining to the inquiry investigation from February 2012 to Present regarding 'Notice of Inquiry' involving the matter of [a board of police commissioners] and [name of a Police Chief] of [a police service].

(Correspondence both internal and external)

Dates: February 2012 to Present

-Any and all emails pertaining to this inquiry investigation

-Individuals that may or may not be a source to these emails, letters, official correspondence are: [names of individuals]

[2] The Saskatchewan Police Commission (SPC) contacted the Applicant to obtain clarification on the request. SPC indicated that it obtained the requested clarification from the Applicant in a January 13, 2015 telephone conversation.

[3] SPC also advised the Applicant that it would be extending the time to respond to the request pursuant to subsections 12(1)(a)(ii) and 12(1)(b) of *The Freedom of Information and Protection of Privacy Act* (FOIP).

[4] On March 16, 2015, SPC provided portions of the responsive records to the Applicant and advised that portions of the records had been withheld pursuant to subsections 29(1), 13(1)(a), 16(1)(a) and 17(1)(a) of FOIP, as well as subsection 27(1) of *The Health Information Protection Act* (HIPA).

[5] SPC advised in its submission that it was also applying subsections 15(1)(c), 15(1)(e), 15(1)(f), 15(1)(k), 15(1)(m), 17(1)(b)(i), 17(1)(b)(ii) and section 22 of FOIP to the withheld portions of the records.

## **II RECORDS AT ISSUE**

[6] The records at issue consist of 151 pages. SPC has broken the records into four sections which they have named Records A, B, C and D. Record A consists of 24 pages. Record B consists of 93 pages. Record C consists of 16 pages. Record D consists of 18 pages.

[7] SPC did not identify any redactions for the following pages of the Records: A1, A7, A14, A15, A21, A22, A23, A24, B4, B6, B8, B9, B10, B17, B24, B25, B36, B40, B55, B64, B72, B86, B88, B89, B91, B93, C5, C12 and D8. As there were no redactions noted, it is my assumption that SPC has released these pages of the record to the Applicant.

[8] Further, in a meeting between SPC and my office, SPC advised that it was no longer applying exemptions to pages B85 and B87 or the attachment to page B92 and would therefore release these pages to the Applicant. In this meeting, it was also clarified that most of the attachments had already been dealt with by my office in another file and therefore those attachments will not be considered in this review.

### **III DISCUSSION OF THE ISSUES**

[9] SPC qualifies as a “government institution” pursuant to subsection 2(1)(d)(ii) of FOIP.

#### **1. Did SPC appropriately apply an extension of time to their response?**

[10] Subsections 12(1)(a)(ii) and (b) of FOIP provides as follows:

**12(1)** The head of a government institution may extend the period set out in section 7 or 11 for a reasonable period not exceeding 30 days:

(a) where:

...

(ii) there is a large number of requests;

and completing the work within the original period would unreasonably interfere with the operations of the government institution;

(b) where consultations that are necessary to comply with the application cannot reasonable be completed within the original period;

[11] It is my understanding that Justice processes requests on behalf of SPC. The submission to my office, provided as follows:

At the end of December 2014, the Ministry [of Justice] had 64 Access to Information (ATI) Requests. This request was received December 23, 2014 and required clarification from the applicant, which was received January 13, 2015. By the end of January the number of open ATI requests had spiked to 108. Additionally, the staff member responsible for this request as well as several others left the branch at the end of January 2015. Due to these circumstances, the work assignments needed to be reallocated to the remaining staff. Through this process and in reference to the volume of requests opened in a very short period of time, consultations between the

Freedom of Information and Privacy Branch and various other officials and program areas within the Ministry were extended to ensure requests were thoroughly searched...

[12] Justice indicated that at the time of the request, there were seven vacancies in the Freedom of Information and Privacy Branch when the number of open requests rose to over 100. Justice advised that normally the average number of open requests would be “somewhere between twenty five to fifty.”

[13] Both the Office of the Information and Privacy Commissioner for British Columbia and Nova Scotia’s Freedom of Information and Protection of Privacy Review Office have resources entitled *Time Extension Requests Guidelines for Public Bodies*. In these resources it lists circumstances that may contribute to unreasonable interference. The lists include: significant increase in requests, significant increase in analysts caseloads and unexpected analysts leave.

[14] Although a “large number of requests” is not defined, it is reasonable to consider at least double the amount of requests normally opened with Justice to be a large number of requests for that Ministry. Further, the fact that at that time Justice had seven vacancies in their Freedom of Information and Privacy Branch, supports the conclusion there was interference with the operations of the government institution to have been met.

[15] Based on the information provided to my office, it appears SPC has reasonably applied an extension of time to their response to the Applicant.

[16] As an extension of time pursuant to subsection 12(1)(a)(ii) of FOIP appears to have been applied appropriately, I will not consider the application of subsection 12(1)(b) of FOIP.

## **2. Did SPC undertake a reasonable search for responsive records?**

[17] A reasonable search is one in which an employee, experienced in the subject matter, expends a reasonable effort to locate records which are reasonably related to the request.

[18] The threshold that must be met is one of “reasonableness.” In other words, it is not a standard of perfection but rather what a fair and rational person would expect to be done or consider acceptable. FOIP and LA FOIP do not require the public body to prove with absolute certainty that records do not exist.

[19] SPC’s submission provides as follows:

A search for records was conducted in the SPC as well as Police and Community Safety Services within the Ministry of Justice. The Inquiry was the responsibility of the SPC, and any emails or other correspondence relating to it would reasonable have originated from or been distributed to the members of the SPC, mainly the current and former executive directors...[the] current Executive Director of the SPC was responsible for the record search...

[The] Director, Policing and Community Safety Services provided...information regarding the record search within the Ministry...

Any emails sent to or received from the individuals identified in the request that are in the possession of the current or former Executive Director of the SPC have been included with the responsive records. No unique emails sent from or received by the identified Ministry officials were located through the search process. Emails belonging to the identified “non-ministry” individuals, which were related to the inquiry have been included in the released and withheld responsive material when they were located. Taking into consideration the wording of the request which states that emails may or may not involve some individuals and the information provided above, the Head submits that a reasonable search was conducted to locate the responsive records...

[20] In its submission, SPC also provided the dates and number of hours that SPC emails spent searching for responsive emails in current and archived email records.

[21] Based on the information provided by SPC regarding their search efforts, it appears that SPC has conducted a reasonable search for responsive records.

**3. Are all records identified by SPC responsive to the request?**

[22] Some of the redacted portions of the records identified by SPC as being responsive have portions that are not responsive to the request. Most of the instances relate to personal notes regarding the employees or their families that do not relate at all to the

investigation. While SPC has identified exemptions for these portions of the records, they are not responsive to the request and therefore can continue to be withheld. Therefore, my office will not take any of the exemptions raised into consideration.

[23] There were also references and copies of invoices that do not appear to be responsive to the Applicant's request, such as the attachment to page B84.

[24] Further, based on a review of the responsive records, I find that the following pages do not appear to be responsive: A16, A17, A18 (The final sentence in the first email string), B20 (first redaction), B32 (first redacted line), B65 (first redacted line), B67 (first paragraph), B70 (first paragraph), B71 (first redaction), B78 and B83 (first two redacted sentences).

**4. Has SPC properly applied subsection 15(1)(c) of FOIP to the responsive records?**

[25] Subsection 15(1)(c) of FOIP provides as follows:

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

...

(c) interfere with a lawful investigation or disclose information with respect to a lawful investigation.

[26] SPC applied subsection 15(1)(c) of FOIP to pages 4-6 of Record A, pages 11-16, 18, 22-23, 26-27, 29-30, 32-35, 37-39, 41-47, 50-54, 56, 58-61, 63-66, 67-71, 73-77, 79-83, 90 and 92 of Record B, pages 1-13 and 16 of Record C and pages 1-7 of Record D.

[27] SPC's submission provides the following regarding the application of this exemption:

Disclosure of many of the redacted and withheld records would release the advice given related to detail of the state of police service and cause the investigation, how the investigations would be conducted, the findings of the investigation, as well as recommendation on actions to be taken based on the findings of the investigation... Therefore, the SPC believes that second part of the test for withholding these go beyond the relationship of the records to the investigation and there is just cause for concern about the reasonable risk of harm.

[28] In order for subsection 15(1)(c) of FOIP to apply, the following test must be considered:

1. Does the public body's activity qualify as a "lawful investigation" under the Act?  
**And**
2. One of the following must exist:
  - a. The release of information would interfere with a lawful investigation, **or**
  - b. The release of information would disclose information with respect to a lawful investigation.

[29] I will consider this test to determine if the subsection 15(1)(c) of FOIP has been applied appropriately.

***1. Does the public body's activity qualify as a "lawful investigation" under the Act?***  
**And**

[30] A *lawful investigation* is an investigation that is authorized or required and permitted by law.

[31] SPC stated in its submission that the investigation qualified as a "lawful investigation" pursuant to subsection 89(1) of *The Police Act, 1990*.

[32] I find that the activity referred to by SPC does qualify as a lawful investigation.

***2. One of the following must exist:***

- a. The release of information would interfere with a lawful investigation, or***
- b. The release of information would disclose information with respect to a lawful investigation.***

[33] *Interfere with* is a less stringent test than the harms test under subsection 19(1)(c). It includes hindering or hampering an ongoing investigation and anything that would detract from an investigator's ability to pursue the investigation.

- [34] To *disclose information* with respect to a lawful investigation, it is only necessary for the public body to demonstrate the information in the record is information with respect to a lawful investigation to meet this part of the test.
- [35] After a review of the emails identified by SPC as being exempt pursuant to subsection 15(1)(c), I found that a number of the emails contained information that would disclose information with respect to the lawful investigation. Those emails my office found to have been appropriately withheld under subsection 15(1)(c) of FOIP.
- [36] I find that subsection 15(1)(c) of FOIP was appropriately applied to pages: A4, A5, A6, B11, B12, B13, B14, B15, B16, B18, B22, B23, B26, second redacted line of B27, second redacted line of B29, second redacted line of B30, B32, B33, B34, B35, B37, B38, B41, B42, B43, B44, B45, B46, B47, B50, B51, B52, B53, B54, B56, B58, B59, B60, B61, B63, B64, B65, B66, B67, B68, B70, B71, B73, B74, B75, B76, B77, B79, B80, B81, B82, B83, C1, C6, C7, C8, C9, C10, C11, C13, C15, C16, D1, D2, D3, D4, D5, D6 and D7.
- [37] Although SPC did not apply subsection 15(1)(c) of FOIP to page A19, it had applied this subsection to page B26. B26 and A19 are the same email. As I have found subsection 15(1)(c) of FOIP to apply to B26, I will also consider A19 to be exempt under subsection 15(1)(c) of FOIP.

**5. Has SPC properly applied subsection 15(1)(k) of FOIP to the responsive records?**

- [38] SPC applied subsection 15(1)(k) of FOIP to pages 11, 12, 15, 16, 18, 22, 23, 35, 38, 45, 46 and 64 of Record B, Pages 1 – 13 of Record C, and Pages 1-7 of Record D. I will only consider the application of subsection 15(1)(k) of FOIP to pages C2, C3, C4 and C5 as I have already found subsection 15(1)(c) to apply to the other pages identified. In the case of C12, SPC had not identified any redactions, therefore it is my assumption it has already been released to the Applicant and I will not consider the application of subsection 15(1)(k) of FOIP.



[39] 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.

[40] SPC provided the following in its submission regarding this exemption:

The information withheld pursuant to section 15(1)(k) relates directly to and discloses information regarding the inquiry investigation or the matter of which [a police service] investigated. Most reveal other information pertaining to issues involving the standards of police service and/or the administrative aspects of conducting the inquiry investigation, which relates to the issue of law enforcement. Subsection 15(1)(k) is being applied as it relates to the [police service]...

[41] The following test is considered when determining the application of 15(1)(k) of FOIP:

1. Does the public body's activity qualify as a "law enforcement matter under the Act? and
2. One of the following must exist:
  - a. The release of information would interfere with a law enforcement matter, or
  - b. The release of which would disclose information with respect to a law enforcement matter.

[42] The redacted portions found on pages C2-C5 are general statements that do not appear to contain any information regarding a law enforcement matter. It is not clear to me how these redacted statements would qualify for exemption under subsection 15(1)(k) of FOIP.

**6. Has SPC properly applied subsection 17(1)(a) of FOIP to the responsive records?**

[43] SPC applied subsection 17(1)(a) of FOIP to pages 2-6, 8-11, and 19-20 of Record A, Pages 10-12, 15-16, 41-44, 59, 63, 65, 73-74, 76 and 79-81 of Record B, pages 1 and 8-11 of Record C and Pages 1-7 of Record D. I will only consider the application of

17(1)(a) of FOIP to pages A2, A3, A8, A9, A10, A20 and B10 as I have already found subsection 15(1)(c) of FOIP to apply to the other pages identified.

[44] 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;

[45] SPC's submission provides as follows:

The information redacted in section A and B, or redacted or withheld in section C and D pursuant 17(1)(a) contains an analysis of the situation occurring with the [police service] and board of commissioners, as well as recommendations... The analysis and recommendations are shared with the involved parties including SPC, the Ministry of Justice, the RCMP and the Investigator. Officials from these parties seek advice from each other and provide information to each other on a variety of issues related to the inquiry investigation, as their individual expertise requires. From there the appropriate party, typically SPC or investigator, use the provided information and take action in order to further the investigation. The advice and recommendations are provided to or offered to the SPC, the Ministry or the investigator, who are central to conducting the inquiry investigation and are ultimately responsible for it.

[46] In order for subsection 17(1)(a) of FOIP to apply, the IPC Guide to Exemptions provides the following test:

1. Does the information qualify as advice, proposals, recommendations, analyses or policy options?
2. The advice, recommendations, proposals, analyses and/or policy options must:
  - a. Either be sought, expected or be part of the responsibility of the person who prepared the record; and
  - b. Be prepared for the purpose of doing something, for example, taking an action or making a decision; and
  - c. Involve or be intended for someone who can take or implement the action.
3. Was the advice, recommendations, analyses and/or policy options developed by or for a government institution or member of the Executive Council?

[47] Pages A2 and A3 of the Record are part of a briefing note and contain recommendations to the Minister. As it appears this information would qualify as recommendations and was prepared for the purpose in providing recommendations to the Minister when making a decision, it appears to qualify for exemption.

[48] Pages A8-A10, A20 and B10 appear to be general statements and it is not clear how the release of this information would qualify as advice, recommendations, proposals, analyses or policy options. As such, it does not appear subsection 17(1)(a) of FOIP applied to these pages of the record.

[49] I find that subsection 17(1)(a) applies to pages A2 and A3 of the record.

**7. Has SPC properly applied subsection 17(1)(b)(i) of FOIP to the responsive records?**

[50] SPC applied subsection 17(1)(b)(i) of FOIP to pages 2 and 3 of Record A, pages 1-2, 7, 16, 22, 26, 41, 42, 44, 45, 47, 50-53, 59, 60, 65, 67, 68, 70, 71, 73-77, 79, 81, and 83 of Record B, pages 1, 6-8 of Record C and pages 1-5 of Record D. I will only consider the application of subsection 17(1)(b)(i) of FOIP to pages B1, B2 and B7 as I have already found other exemptions to apply to the pages identified.

[51] Subsection 17(1)(b)(i) 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 of employees of a government institution;

[52] SPC's submission provides as follows:

In considering this authority, the Head first determined that the records involved a staff of the Ministry or SPC and that they involved either consultations where the views are being sought about a particular proposal, decision or action to be taken.

[53] The test for this subsection is as follows:

A consultation occurs when the views of one or more officers or employees of the public body are sought as to the appropriateness of a particular proposal or suggested action.

A deliberation is a discussion or consideration by the persons described in the section, of the reasons for and against an action. It refers to discussions conducted with a view towards making a decision.

In order to qualify, the opinions solicited during a “consultation” or “deliberation” must:

- i) must be either sought, expected, or be part of the responsibility of the person who prepared the record; and
- ii) be prepared for the purpose of doing something, such as taking an action, making a decision or a choice.

[54] Pages B1 and B2 of the Record contains information about the investigation as well as a government employee’s suggested action regarding this matter. This would qualify as a consultation. The consultation was prepared for the deputy minister to make a decision. This would qualify for exemption pursuant to subsection 17(1)(b)(i) of FOIP.

[55] The redaction noted on page B7 does not appear to fit the definition of a consultation or deliberation involving officers or employees of a government institution or a member of the executive council.

[56] I find that subsection 17(1)(b)(i) of FOIP applies to pages B1 and B2 of the record.

**8. Has SPC properly applied subsection 13(1)(a) of FOIP to the responsive records?**

[57] Subsection 13(1)(a) of FOIP was applied to pages 13, 18 and 19 of Record A, pages 34, 38, 41, 51, 52, 54, 56-58, 61-63, 65-66, 69 and 71 of Record B, pages 2-4 of Record C and pages 9-18 of Record D. I will only consider the application of subsection 13(1)(a) of FOIP to pages B57, B62, B69, C2-C4 and D9-D18 as the other pages have already been found exempt under other exemptions.

[58] Subsection 13(1)(a) of FOIP provides as follows:

13(1) A head shall refused to give access to information contained in a record that was obtained in confidence, implicitly or explicitly, from:

(a) the Government of Canada or its agencies, Crown corporations or other institutions;

[59] The test for subsection 13(1)(a) of FOIP provides as follows:

1. Was the information obtained from a federal, provincial or foreign government or international organization of states or a local authority?

2. Was the information obtained implicitly or explicitly in confidence?

[60] SPC's submission provides as follows:

...section 13(1)(a) was applied to information that was provided by and/or relates to the RCMP/Public Safety Canada for the purposes of the Investigator conducting the inquiry investigation. They provide information related to the inquiry investigation. The information was provided in confidence to [the Investigator] as part of the RCMP's agreed-to role in the investigation.

[61] The redacted portion of page B57 is a signature line for an RCMP employee. It is not clear to me how this information would have been obtained implicitly or explicitly. As such, I do not find subsection 13(1)(a) of FOIP to apply.

[62] B62 is also a signature line. This signature line is for a RCMP employee who is acting in the role of the chief of a police service. As he is not acting in the role of RCMP it is not clear how subsection 13(1)(a) of FOIP would apply. Further, it does not appear to be obtained implicitly or explicitly in confidence and this information was released in other portions of the record. I do not find subsection 13(1)(a) of FOIP to apply.

[63] Page B69, this is an email is from the chief of a police service, therefore it would not be considered a federal, provincial or foreign government. Therefore, subsection 13(1)(a) of FOIP does not apply.

[64] Pages C2 – C4 contains very general statements from an employee of the Government of Canada. It is not clear how SPC arrived at the conclusion that the information was supplied in confidence implicitly or explicitly. I do not find 13(1)(a) of FOIP to apply.

[65] Pages D9-D18 are an MOU between the RCMP and a police service. While it appear from the emails that SPC obtained a copy of it from the RCMP, it is not clear how SPC arrived at the conclusion it was supplied implicitly or explicitly in confidence. As it is not clear how the second part of the test has been met, I do not find subsection 13(1)(a) of FOIP to apply.

[66] It does not appear the pages identified by SPC qualify for exemption under subsection 13(1)(a) of FOIP.

**9. Has SPC properly applied subsection 29(1) of FOIP to the responsive records?**

[67] Subsection 29(1) of FOIP was applied to pages 12, 13, and 16-18 of Record A, pages 11, 12, 14, 17-21, 27-32, 35, 37, 39-42, 48, 49, 51, 54, 58, 59, 61, 63, 65, 68, 71, 78-83, 90 and 92 of Record B and pages 6-8 of Record D. I will consider the application of this exemption to pages A12, A13, A16, A17, A18, B17, B19, B20, B21, B27, B28, B29, B31, B39, B48, B49, B90 and B92 as the other pages of the record have already been found to have been appropriately withheld.

[68] 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.

[69] Subsection 24(1) of FOIP provides a list of examples of what is considered personal information. However this list is non-exhaustive. Two considerations when determining if the information in question would qualify as personal information are:

Is there an identifiable individual? Identifiable individual means that it must be reasonable to expect that an individual may be identified if the information were disclosed. The information must reasonably be capable of identifying particular individuals because it either directly identifies a person or enables an accurate inference to be made as to their identity when combined with other available sources of information or due to the context of the information in the record.

Is the information personal in nature? Personal in nature means that the information reveals something personal about the individual. Information that relates to an individual in a professional, official or business capacity could only qualify if the information revealed something personal about the individual for example, information that fits the definition of employment history.

[70] Examples of the pages where SPC applied subsection 29(1) of FOIP are as follows.

[71] SPC applied subsection 29(1) of FOIP to line one and three of B27. Line one is information relating to the Applicant so it would not qualify as personal information of another individual. Line three of this page of the record is an after-hours telephone number for a business. As this telephone number is included in the business' signature line it is my assumption that this is a business telephone number, not a personal telephone number. Further the after-hours number is located on the business' website. If this is a business telephone number it should be released. If it is a personal telephone number of an individual, it should continue to be withheld under subsection 29(1) of FOIP. Pages B28, B29, B31, B48, B49 and C14 also have the after-hours phone number redacted. The same analysis applies.

[72] SPC did not apply subsection 29(1) of FOIP to B7, however it appears the redacted portions with the exception of the first two sentences would qualify as personal information pursuant to subsection 24(1)(b) of FOIP. As subsection 29(1) of FOIP is a mandatory exemption, I find that B7 should continue to be withheld.

[73] SPC redacted the cell phone numbers of RCMP employees, for example pages A13, B58, B62 and B69. If these cell phone numbers are business telephone numbers, they should be released. If they are personal telephone numbers they should continue to be withheld.

[74] I find that subsection 29(1) of FOIP applies to pages A18 (except the redacted email address) and B7 (except first two redacted sentences) of the records.

[75] My office provided SPC with a Draft Review Report listing the pages of the record recommended for release to the Applicant. SPC agreed to the recommended pages for release and advised my office it would release those page to the Applicant.

[76] SPC copied my office on the letter to the Applicant dated January 27, 2016 releasing the pages of the record to the Applicant. I thank SPC for releasing pages prior to the issuing of my report. This allows citizens to get the requested information sooner. I would encourage all public bodies to do this.

#### **IV FINDINGS**

[77] I find that the extension of time was reasonable pursuant to subsection 12(1)(a)(ii) of FOIP.

[78] I find that SPC conducted a reasonable search for responsive records.

[79] I find that subsections 15(1)(c), 17(1)(a), 17(1)(b)(i) and 29(1) of FOIP was applied appropriately to some portions of the records.

#### **V RECOMMENDATION**

[80] I recommend that SPC take no further action regarding this matter.

Dated at Regina, in the Province of Saskatchewan, this 2nd day of February, 2016.

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