



Office of the  
Saskatchewan Information  
and Privacy Commissioner

## **REVIEW REPORT 148-2024, 163-2024**

### **Ministry of Trade and Export Development**

**January 23, 2025**

#### **Summary:**

The Applicant made an access to information request to the Ministry of Trade and Export Development (Trade and Export Development) for records relating to recent travel by the Minister. Trade and Export Development denied access to portions of the records pursuant to subsections 18(1)(b), 19(1)(c)(ii) and 29(1) of *The Freedom of Information and Protection of Privacy Act* (FOIP). It also withheld some information as non-responsive. During the review, the A/Commissioner's office notified a third party with an interest in the records. The third party claimed that the information involving it was exempt pursuant to subsections 19(1)(b), (c)(ii) and (iii) of FOIP. Also, during the review, the Applicant removed some information from the scope of the review and Trade and Export Development released additional information to the Applicant. The A/Commissioner found that Trade and Export Development properly applied subsection 29(1) of FOIP to some information but not all. He also found that the exemptions in subsection 19(1)(b), (c)(ii) and (iii) of FOIP did not apply to the third party's information. However, he also found that Trade and Export Development did not properly claim that information was responsive to the request. The A/Commissioner recommended that Trade and Export Development release to the Applicant, within 30 days of the issuance of this Report, and continue to withhold information, as set out in the Appendix. He also recommended that Trade and Export Development release the records it found to be non-responsive, subject to any exemptions that may apply.

#### **I BACKGROUND**

[1] This review involves a request for access to information made to the Ministry of Trade and Export Development (Trade and Export Development) under *The Freedom of Information and Protection of Privacy Act* (FOIP). The Applicant sought access to records relating to

the Minister of Trade and Export Development's (Minister) trip to Berlin and Frankfurt, Germany dated between May 1, 2023 and June 5, 2023. The request described the records as follows:

- All receipts for all expenses, including accommodation, travel, meals, incidental and miscellaneous for the Minister, staff and any other accompanying parties
- Minister's itinerary and meeting notes
- Itineraries and meeting notes from staff including in advance of travel.

- [2] Trade and Export Development received the request on March 7, 2024.
- [3] On April 25, 2024, Trade and Export Development notified the Applicant that it was extending the time to respond to the access to information request by 30 days pursuant to subsection 12(1)(a)(ii) of FOIP. It believed that the records contained information that may be subject to the third party exemption in section 19 of FOIP.
- [4] Trade and Export Development issued its section 7 decision on May 24, 2024. In its response, it provided a link to the publicly available information from the receipts requested in the first part of the request pursuant to subsection 7(2)(b) of FOIP. It did not release the receipts. It released records responsive to the other parts of the request and withheld portions of them as non-responsive or pursuant to subsections 19(1)(c)(ii) and 29(1) of FOIP.
- [5] On May 30, 2024, the Applicant filed a request for a review of Trade and Export Development's decision with my office. Review File 148-2024 was opened to process the review.
- [6] On June 20, 2024, during my office's attempts at early resolution, Trade and Export Development issued another section 7 decision releasing 64 pages of receipts and withholding portions pursuant to subsections 18(1)(b) and 29(1) of FOIP and claiming portions were not responsive. Subsequently, the Applicant advised my office that it sought

a review of Trade and Export Development's decision to withhold portions of these receipts.

[7] Review File 163-2024 was opened to process the review.

[8] As the two reviews arise out of the same request and involve the same parties, I have decided to issue one report dealing with both reviews.

[9] On June 24, 2024, my office notified Trade and Export Development and the Applicant that my office was undertaking these reviews. My office also notified the University of Saskatchewan (U of S) that it was identified as a third party in Review File 148-2024 and that it was entitled to make representations in that matter.

[10] On June 25, 2024, Trade and Export Development wrote to my office advising that it would like to add section 21 of FOIP as an additional exemption to some of the records responsive to the request. It stated that the failure to claim section 21 of FOIP was an oversight.

[11] In response, my office pointed to section 2-4(3) of the [Rules of Procedure](#) to Trade and Export Development. My office recommended that Trade and Export Development set out in its submission why and how section 21 of FOIP applies to portions of the records. My office also recommended that it explain what exceptional circumstances existed to permit it to raise the exemption at this late stage. I will address the late raising of this discretionary exemption below.

[12] On July 31, 2024, Trade and Export Development provided my office with a redacted and unredacted version of the responsive records in both review files.

[13] The U of S provided my office with a submission on September 6, 2024. In addition to the application of subsection 19(1)(c)(ii) of FOIP, the U of S claimed that portions of the records were exempt pursuant to subsections 19(1)(b), (c)(iii) and 29(1) of FOIP. As these are mandatory exemptions, I will be considering their potential application in this review.

[14] On September 18, 2024, Trade and Export Development released additional information to the Applicant. Therefore, that information is no longer at issue in this review. The details are set out in the discussion that follows regarding the records at issue.

[15] Also on September 18, 2024, Trade and Export Development provided my office with a submission. Its submission addressed the application of subsections 18(1)(b), 19(1)(b), (c)(ii), 21 and 29(1) of FOIP.

[16] The Applicant did not provide a submission.

[17] Both Trade and Export Development and U of S stated that their submissions may not be shared with the Applicant. Trade and Export Development also stated that the indices of records provided to my office may not be shared with the Applicant.

[18] Subsection 46(3) of FOIP gives my office the authority to disclose any matter it considers necessary to disclose to facilitate the review and any matter that is necessary to disclose to establish grounds for the findings and recommendations in the report. Subsections 46(1) and (3) of FOIP state:

**46(1)** Subject to clause 45(2)(e), the commissioner shall not disclose any information that comes to the knowledge of the commissioner in the exercise of the powers, performance of the duties or carrying out of the functions of the commissioner pursuant to this Act.

...

(3) Notwithstanding subsection (1), the commissioner may disclose:

(a) in the course of a review pursuant to section 49, any matter that the commissioner considers necessary to disclose to facilitate the review; and

(b) in a report prepared pursuant to this Act, any matter that the commissioner considers necessary to disclose to establish grounds for the findings and recommendations in the report.

[19] I have considered the claims that the submissions and indices should not be shared in writing this report. In this Report, I have only included the information from the submissions and indices of records that is necessary to disclose to facilitate the review and

to establish grounds for my findings and recommendations in accordance with subsection 46(3) of FOIP.

## II RECORDS AT ISSUE

[20] There are two groups of records at issue. Group One consists of 25 pages of itineraries. Group Two consists of 64 pages of receipts for travel that are responsive to part one of the request. Trade and Export Development withheld portions of information on all of the pages. Therefore, no records were withheld in full.

[21] The Appendix sets out a description of the portions withheld, and the exemptions applied. It also indicates where portions were withheld as non-responsive.

[22] There were discrepancies relating to exemptions claimed and descriptions of the information withheld in the two indices of records provided to my office and the redlined versions of the records. Where there is conflict, I have relied on the redlined versions of the records for information about which exemptions Trade and Export Development applied to the records and the nature of the withheld information.

[23] As noted above, on September 18, 2024, Trade and Export Development released some additional information to the Applicant. This information was comprised of information about QST/GST exemption codes, merchant transaction codes, invoice numbers, financial transaction IDs, ticket refund coupons, invoice reference numbers and names and job titles of the U of S and VIDO employees. Therefore, this information is no longer at issue and is not set out in the Appendix.

[24] During the review, the Applicant stated that they were not seeking access to the handwritten signatures and the following information:

Information withheld from receipts and itineraries that involves credit card information such as account numbers and expiry dates, INTERAC account information, travel voucher numbers, travel booking reference numbers, flight numbers, flight seat numbers, flight voucher numbers, fare basis codes, authorization numbers and invoice numbers.

Information withheld from taxi and hotel receipts relating to the vendor which includes cashier numbers, merchant, transaction and approval codes, and other system, banking and regulatory data.

[25] Therefore, the withheld information that is described above, is no longer at issue in this review. I will not be considering below if exemptions were properly applied to this information. Consequently, Trade and Export Development's application of subsection 18(1)(b) of FOIP is no longer at issue.

[26] The Appendix does not include a listing of the information that is outside of the scope of the review. This information can be found on the following pages and severances numbers:

Group One – page 1, severances 1 to 4, 8; page 2, severances 2 to 6, 8, 12 to 14; page 8, severances 8 to 11; page 10, severances 7 to 9; page 11, severances 2 to 6; page 12, severances 1 to 4, 8; page 13, severances 2, 6, 7, 8; and page 22, severances 6 to 9.

Group Two – pages 1 and 4, all severances; page 2, severances 1 to 6, 7, 8; page 3, severances 3, 4; page 5, severances 1 to 7; page 10, all severances but for frequent flyer number; page 12, all severances; page 14, all severances; page 15, severances 3 to 6, 8 to 14; page 16, severances 4 to 19; page 17, severance 1; page 18, severance 2; page 19, all; page 20, all severances; page 22, all severances; page 23, all severances; page 30, all severances; page 31, all severances; page 32, all severances; page 31, all severances; page 32, all severances; page 34, severances 4 to 9, 12; page 35, severances 9, 11; page 36, all severances; page 37 all severances; page 42, all severances; page 43; all severances; page 45, severances 5,8; page 46, severances 5 to 16; page 48 all severances; page 49, all severances; page 54, severances 1 to 4; page 55 severances 4 to 5, 7, 8 to 10, 12, 15; page 56, severances 8 to 10, 12 to 14; page 58, all severances; page 60, severances 5, 9; page 61, severances 3, 4, 8, 9, 10; page 62, severances 4, 5; and page 63, severances 1 to 3.

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

#### **1. Do I have jurisdiction?**

[27] Trade and Export Development qualifies as a “government institution” pursuant to subsection 2(1)(d)(i) of FOIP. Therefore, I have jurisdiction to conduct this review.

**2. Do exceptional circumstances exist to consider the discretionary exemption claimed by Trade and Export Development after it issued its section 7 decision?**

[28] As previously stated, following the issuance of my office’s notices of review, Trade and Export Development raised the application of section 21 of FOIP for the first time. Section 21 of FOIP states:

**21** A head may refuse to give access to a record if the disclosure could threaten the safety or the physical or mental health of an individual.

[29] Section 21 of FOIP is a discretionary exemption. It permits refusal of access in situations where disclosure of a record could threaten the safety or the physical or mental health of an individual. The threshold for “could” is somewhat lower than a reasonable expectation but well beyond or considerably above mere speculation. On a continuum, speculation is at one end and certainty is at the other. The threshold for “could” therefore, is that which is possible (*Guide to FOIP*, Chapter 4: “Exemptions from the Right of Access” updated April 8, 2024 [*Guide to FOIP*, Ch. 4], pp. 255 - 256).

[30] My office’s [The Rules of Procedure](#) subsection 2-4(3) states that discretionary exemptions not included in the head’s section 7 decision will not be considered by my office unless there are exceptional circumstances.

[31] While Trade and Export Development’s submission attempts to address the merits of its claim to section 21 of FOIP, it did not provide information about the exceptional circumstances that justify the late raising. For example, it did not explain why the exemption was claimed so late in the review process other than its initial statement that it was an oversight. Nor did it explain if or how it would be prejudiced if permission to raise the exemption at this stage was denied. Consequently, I find that Trade and Export Development has not established that exceptional circumstances exist to permit the late raising of this exemption.

[32] Even if I were to allow the late raising of section 21 of FOIP, Trade and Export Development's submission would not support a finding that section 21 of FOIP applies for the following reasons.

[33] Its submission stated that the head applied this exemption to certain information that, if released, could threaten the physical safety and security of individuals. It added that the head made the determination in consultation with "security partners and in accordance with security policy." It invited my office to contact the head for further information. It did not provide any information about the nature of the risk, the security partners involved and the applicable security policy.

[34] Based on a review of the records, it is apparent that Trade and Export Development applied the exemption to information such as flight booking codes, flight numbers, airline seat numbers, ticket numbers, frequent flyer numbers, taxi receipt reference numbers and financial transaction codes, hotel names and logos. All of this information relates to flights, taxi rides and hotel stays that have already occurred. Given the nature of the withheld information, I do not see how release could threaten the safety or the physical or mental health of an individual.

[35] Trade and Export Development's submission amounts to little more than a bald assertion that the exemption applies. As set out in section 61 of FOIP, the burden of establishing that the exemption applies in the context of a review by my office lies with the head. Section 61 of FOIP which states:

**61** In any proceeding pursuant to this Act, the burden of establishing that access to the record applied for may or must be refused or granted is on the head concerned.

[36] Institutions should not point to individuals or organizations that it thinks my office should turn to for further information to support the application of an exemption. In a review, the head of the government institution has the onus of establishing that an exemption applies.

[37] Trade and Export Development also claimed that the relevant information was exempt pursuant to subsection 29(1) of FOIP. Therefore, I must consider the potential application



of that exemption before I can make a recommendation to release or withhold this information.

### 3. Were portions of the records non-responsive?

[38] Trade and Export Development withheld portions of the records claiming that they were not responsive to the Applicant's access to information request. Details regarding the type of information it found to be non-responsive are set out in the Appendix.

[39] My office's *Guide to FOIP*, Chapter 3: "Access to Records", updated May 5, 2023 (*Guide to FOIP*, Ch. 3), explains at pages 26 to 27, that when a government institution receives an access to information request, it must determine what information is responsive to the access request. "Responsive" means relevant; anything reasonably relevant to the request. It follows that any information or records that do not reasonably relate to an applicant's request will be considered "not responsive."

[40] The following factors should be considered when determining if information is non-responsive:

- The request sets out the boundaries of relevancy and circumscribes the records or information that are responsive to the request.
- A government institution can remove information as not responsive only if the applicant has requested specific information, such as the applicant's personal information.
- The government institution may treat portions of a record as not responsive if they are separate, distinct, and entirely unrelated to the access request. However, use it sparingly and only where necessary.
- If it is just as easy to release the information as it is to claim not responsive, the information should be released (i.e., releasing the information will not involve time-consuming consultations nor considerable time weighing discretionary exemptions).
- The purpose of FOIP is best served when a government institution adopts a liberal interpretation of a request. If it is unclear what the applicant wants, a government

institution should contact the applicant for clarification. Generally, ambiguity in the request should be resolved in the applicant's favour.

*(Guide to FOIP, Ch. 3, pp. 26-27)*

- [41] Trade and Export Development's submission did not explain how or why certain information was withheld as not responsive to the request. Under the heading, "Responsive Records," it merely described the records at issue and stated:

Two records were released to the applicant. The first records of 25 pages were released to the applicant on May 24, 2024 (IPC file number 148-2024). This was a partial release using sections 19(1)(c)(ii) and 29(1) of FOIP. The Ministry will also be relying on section 21 of FOIP for these records.

The second records with 64 pages were released to the applicant on June 19, 2024, as part of IPC's early resolution mechanism. The IPC review file number for these records is 163-2024. This was also a partial release using sections 18(1)(b) and 29(1) of FOIP. TED will also be relying on section 21 of FOIP for these records.

- [42] As with the application of exemptions, government institutions have the burden under section 61 of FOIP of establishing that information is not responsive.

- [43] In this case, the Applicant sought access to copies of receipts, itineraries and meeting notes. They did not seek access to portions of those records or specific information about the records.

- [44] The portions of the records that were withheld as non-responsive in Review File 163-2024 were airline names, hotel names, logos and addresses, handwritten notes added to the receipts after they were printed, serial numbers for the systems that generated invoices, and two addresses.

- [45] The portions of the records withheld as non-responsive from the itineraries at issue in Review File 148-2024 were described as "logistics arrangement" such as who would be meeting the delegation at various points, hotel names and addresses, hotel costs and terms of service, estimated travel times between various events, booking confirmation numbers, conditions for access to meetings, addresses for meeting locations, description of gifts for

hosts and the description of the SharePoint link or file path information that reveal where electronic copies of the itineraries were saved.

[46] Based on a review of the records, the withheld portions are not separate and distinct from the access request because they fall directly within the scope of the request. This includes the file path information, which I have found in previous reports to be part of the record at issue and responsive to an access to information request (see for example my office's [Review Report 086-2018](#), [Review Report 195-2019](#) and [Review Report 185-2022](#)).

[47] Regarding the handwritten notes on receipts, they appear to provide information about the receipt used to support the claim to recover the cost. In my view, any explanatory notes written on the receipts should be treated as responsive to a request for a copy of the receipt.

[48] Therefore, I find that all of the information withheld as non-responsive is responsive to the request. Where no exemptions have been claimed in the alternative, I recommend that Trade and Export Development, within 30 days of the issuance of this Report, release the information to the Applicant, subject to any exemptions that may apply. Where the only exemption claimed in the alternative is section 21 of FOIP, I recommend that Trade and Export Development, within 30 days of the issuance of this Report, release the information to the Applicant. Details are set out in the Appendix.

[49] In one case, Trade and Export Development applied subsection 29(1) of FOIP to information that it also claimed was non-responsive. I will consider later in this Report if subsection 29(1) of FOIP was properly applied to this information before I make a recommendation to release or withhold it.

#### **4. Did Trade and Export Development properly apply subsection 29(1) of FOIP?**

[50] Trade and Export Development applied subsection 29(1) of FOIP to various information in the Group One and Group Two records.

[51] Regarding the Group One records or itineraries, the U of S initially claimed that the names and job titles of its staff were subject to subsection 29(1) of FOIP. As this information was released to the Applicant in September of 2024, I need not consider it further here. However, the U of S also claimed that the names, job titles and organizations of its “German partners” qualified as personal information.

[52] Trade and Export Development claimed that the withheld information qualified as personal information pursuant to subsections 24(1)(d), (e) and (k) of FOIP. The U of S also claimed that names, job titles and organizations of meeting attendees qualified as personal information pursuant to subsections 24(1)(b) and (k) of FOIP. These provisions state:

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:

...

(b) information that relates to the education or the criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved;

...

(d) any identifying number, symbol or other particular assigned to the individual, other than the individual’s health services number as defined in The Health Information Protection Act;

(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.

***Business card information***

[53] With respect to the names, job titles and organizations of meeting attendees, Trade and Export Development stated that information such as names, job titles, phone numbers,

business addresses who are not Government of Saskatchewan employees qualifies as personal information pursuant to subsection 24(1)(e) of FOIP. It stated:

TED realizes that the IPC is of the opinion that business card information is not personal in nature and would not qualify as personal information. However, TED opines that FOIP clearly states in section 24(1)(e) that this information is personal information.

[54] The U of S made a similar argument but added that the information also qualified as personal information pursuant to subsection 24(1)(b) of FOIP because it was employment history information. It stated:

Whether or not the Commissioner finds that the names of organizations should be disclosed, USask submits that the names of individuals must be withheld.

While the Commissioner has distinguished ‘business card information’ from personal information, USask respectfully disagrees with this approach. Information about where a person works is clearly information about an identifiable individual and part of their employment history. Further, disclosing information about these individuals’ attendance at these meetings, even if organization [sic] were redacted, reveals information about an individual – ie. their whereabouts and goings on. These individuals are not employees of the Government of Saskatchewan and their employment information is not exempt from the definition of personal information. For these reasons, USask submits that the names of individuals must be withheld.

[55] Before I address these arguments, it is important to understand the context in which these records were created. The purpose of the Minister’s trip to Germany was made publicly available in a Government of Saskatchewan [press release](#) issued on May 29, 2023. According to this release, the purpose of the trip was to officially open Saskatchewan’s international office in Berlin, Germany and to explore opportunities with German and European Union buyers looking for products from Saskatchewan. Based on a review of the records at issue, it is apparent that the meetings to which they relate were business, work or professionally related and the individuals participated in their business, work or professional capacity.

[56] In my office’s [Review Report 093-2024](#), I set out the history of and rationale for my office’s approach to business card information. The essence of the approach is that for information to qualify as personal information, it must be personal in nature and about an

identifiable individual. This requirement is set out in the opening part to subsection 24(1) of FOIP which states:

**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 [Emphasis added]

[57] Generally, information about an individual that appears in a professional, official or business context is not considered to be personal in nature.

[58] There are examples that follow in subsections 24(1)(a) through (k) of FOIP of information that may qualify as personal information. However, even where information may appear to fall within one of the examples, the requirement for the information to be personal in nature must still be met.

[59] In some circumstances, business title and business-related contact details may reveal something of a personal nature about an individual. As stated in my office’s [Review Report F-2012-006](#), business card information may be considered personal information where it links the employee’s name and business card information “to other details of a personal nature contained within the records.”

[60] These were the circumstances in [D’arcy Hande v. University of Saskatchewan](#) (*Hande*) QBG 1222 of 2018 (SK KB) where the court considered if the opinions and views of the U of S’s employees, their names and their work positions at the U of S qualified as personal information under *The Local Authority Freedom of Information and Protection of Privacy Act* (LA FOIP). The court found that the employees were attending a symposium where the purpose was to share “individual perspectives” and “speak as individuals and to express views that may not be those of their employer or the universities they are associated with.” In those circumstances, the court found that their names and positions were associated with opinions and views that were personal in nature and therefore qualified as personal information that was exempt pursuant to subsection 28(1) of LA FOIP (which is equivalent to subsection 29(1) of FOIP).

- [61] My office has found in multiple previous reports that business card information does not qualify as personal information where it appears in a business context. This includes my office's Review Report [154-2024](#) at paragraph [39] which refers to previous reports such as my office's Review Reports [137-2024](#), [053-2024](#) and [333-2023](#).
- [62] The circumstances at issue in this matter are distinct from those at issue in *Hande*. The information at issue in the *Hande* case was the opinions and views and identifying information and job titles of individuals who attended a symposium in their personal capacity. The business card information at issue here relates to the individuals' professional or business-related meetings and activities and therefore appears in a business context. It is not personal in nature.
- [63] I note that U of S's submission appears to be that the information qualifies as personal information because it relates to their employment history and that it reveals information about individuals' "whereabouts and goings on." It does not specifically address whether the information is personal in nature. In my office's previous reports, I have addressed similar arguments regarding the application of subsection 24(1)(b) of FOIP to business card information. In reports such as Review Reports [133-2020](#), I have found that business card information does not qualify as employment history information because it is not personal in nature.
- [64] Trade and Export Development's argument relies on the example set out in subsection 24(1)(e) of FOIP - an argument which fails to recognize the requirement in the preamble to section 24(1) of FOIP that the information must be personal in nature.
- [65] My office's approach to business card information is consistent with the approach taken by other access to information and privacy regulators in Canada, including in Ontario and Alberta.
- [66] Subsection 2(1) of Ontario's *Freedom of Information and Protection of Privacy Act* defines "personal information" in a manner that is similar to subsection 24(1) of FOIP. It states that personal information is "recorded information about an identifiable individual." In its

orders, the Ontario Information and Privacy Commissioner (ON IPC) has consistently found that information is “about” an individual only if it refers to them in their personal capacity, which means that it reveals something of a personal nature about them. Consistent with my office’s approach, the ON IPC has also found that generally, information about an individual in their professional, official or business capacity is not considered to be “about” the individual. See for example, ON IPC’s [Order PO-4276](#) and [Order PO-4216](#).

[67] Subsection 1(n) of Alberta’s *Freedom of Information and Protection of Privacy Act* (AB FOIP) defines “personal information” in part as follows:

1 In this Act,

...

(n) “personal information” means recorded information about an identifiable individual, including

(i) the individual’s name, home or business address or home or business telephone number,

[68] Like subsection 24(1)(e) of FOIP, subsection 1(n)(i) of AB FOIP includes business address and business telephone numbers as examples of information that *may* qualify as personal information. In its inquiries, Alberta’s Office of the Information and Privacy Commissioner (AB IPC) has consistently found that the names, contact information and job titles of individuals acting in their professional capacities is not personal information unless that information has a personal dimension. See for example, AB IPC’s [Order F2019-09](#) and [Order F2023-42](#).

[69] I am not persuaded that my office’s approach to this type of information is wrong. Accordingly, I find that the meeting attendees’ names, job titles and their associated organizations do not qualify as personal information. Therefore, I find that Trade and Export Development did not properly apply subsection 29(1) of FOIP to this information.

[70] In some cases, subsections 19(1)(c)(ii) and (iii) of FOIP have also been applied to business card information such as in relation to the U of S’s “German Business partners.” Where



that is the case, I will reserve my recommendations regarding release of this information until I have considered if those exemptions were properly applied.

- [71] Where only subsection 29(1) of FOIP was applied to business card information, I recommend that Trade and Export Development, within 30 days of the issuance of this Report, release this information to the Applicant. Details of my findings and recommendations are set out in the Appendix.

### ***Travel, event and meeting itineraries***

- [72] Trade and Export Development applied subsection 29(1) of FOIP to withhold some information from the itineraries that is now outside the scope of the review. I have already addressed the business card information that was withheld from this group of records. The remaining information at issue in these records can be described as information about the hotel cost and inclusions.

- [73] The costs incurred for accommodation during a government business trip do not qualify as personal information because the information does not reveal anything personal in nature about an identifiable individual. Moreover, they are costs that were paid by the Government of Saskatchewan and not by the individuals. I find that this information is not personal information.

- [74] I find that Trade and Export Development did not properly apply subsection 29(1) of FOIP to this information. I recommend that Trade and Export Development release this information to the Applicant within 30 days of the issuance of this Report. Details are set out in the Appendix.

### ***Travel receipts***

- [75] Portions of the 64 pages of receipts for travel expenses were withheld pursuant to subsection 29(1) of FOIP. They are described in the Appendix as Group Two records. Much of this information has been removed from the scope of the review by the Applicant.

- [76] The remaining information in the receipts that has been withheld under subsection 29(1) of FOIP can be described as follows: names and email addresses of Trade and Export Development's staff who were engaged in booking the travel, loyalty card numbers, home address of a ministry employee, names of Uber drivers and discount related information, addresses on Uber and taxi receipts for pick up and drop off points, addresses for taxi companies, hotel room numbers, names and addresses for hotel parent companies and its bank, name of airline and the hotel name which appears on a taxi receipt.
- [77] The names and work email addresses of Trade and Export Development staff engaged in making the travel arrangements are business card information. For the reasons set out previously, this information does not qualify as personal information. Therefore, Trade and Export Development did not properly apply subsection 29(1) of FOIP to this information.
- [78] The names of Uber drivers, hotel room numbers, names and addresses for hotel parent companies and their banks, names of airlines, and the addresses for taxi companies do not qualify as personal information. This information also qualifies as business card information because it is not personal in nature. Therefore, Trade and Export Development did not properly apply subsection 29(1) of FOIP to this information.
- [79] Trade and Export Development claimed that pick-up and drop-off addresses on taxi receipts were personal information. Based on a review of the address information, it appears that some of the addresses were for places of business and the addresses for hotels. This information does not qualify as personal information because it reveals nothing of a personal nature about an individual. Therefore, Trade and Export Development did not properly apply subsection 29(1) of FOIP to this information.
- [80] I recommend that Trade and Export Development, within 30 days of the issuance of this Report, release to the Applicant the information described in paragraphs [77] to [79] above. Details are set out in the Appendix.

[81] In six cases, Trade and Export Development applied subsection 29(1) of FOIP to what appear to be home addresses for various individuals. I find that this information qualifies as the individuals' personal information pursuant to subsection 24(1)(e) of FOIP. Therefore, I find that Trade and Export Development properly applied subsection 29(1) of FOIP to this information. I recommend that Trade and Export Development continue to withhold this information. Details are set out in the Appendix.

*Customer loyalty card numbers*

[82] The frequent flyer numbers and customer loyalty card numbers are associated with the individuals named in the records. It is commonly understood that the programs to which these numbers relate provide personal benefits to members. Such information would qualify as an identifying number associated with an individual as defined by subsection 24(1)(d) of FOIP which is set out above. This is consistent with the approach taken in my office's previous reports including [Review Report 060-2024](#).

[83] Therefore, I find that this information qualifies as personal information pursuant to subsection 24(1)(d) of FOIP. I find that Trade and Export Development properly applied subsection 29(1) of FOIP to this information. I recommend that Trade and Export Development continue to withhold this information. See the Appendix for details.

**5. Does subsection 19(1)(b) of FOIP apply to the withheld information?**

[84] I will now consider if subsection 19(1)(b) of FOIP applies to the withheld information. While initially claimed by the U of S only, both the U of S and Trade and Export Development filed submissions claiming that this exemption applied. The U of S stated:

Among the records identified by the Ministry as being responsive to the request was an itinerary for a Mission to Germany, May 29 - June 3, 2023 (the "Itinerary"). This document contained personal information and third party information that pertained to USask and its partners; this information was withheld by the Ministry.

...These submissions will focus on the names and organizations listed as USask's German Partners on pages 6 and 19 of the Itinerary.

...

Specific to this matter, the Ministry must withhold records that contain:

- commercial information that is supplied in confidence by a third party [s. 19(1)(b)];

[85] The U of S claimed that subsection 19(1)(b) applied to “the list of VIDO’s [Vaccine and Infectious Disease Organization] existing and potential business partners involved in funding, research and development.”

[86] Trade and Export Development’s indices and redacted records did not identify the page and severance number for the information to which it applied subsection 19(1)(b) of FOIP. However, from its submission, it is apparent that it applied this exemption to information it described as the names, job titles and names of affiliated organizations of U of S’s “German partners” on Group One, pages 6 and 19.

[87] Section 19 of FOIP is intended to protect the business interests of third parties and to ensure that government institutions are able to maintain the confidentiality necessary to effectively carry on business with the private sector (*Guide to FOIP*, Ch. 4, at p. 193).

[88] Subsection 19(1)(b) of FOIP provides:

**19(1)** Subject to Part V and this section, a head shall refuse to give access to a record that contains:

...

- (b) financial, commercial, scientific, technical or labour relations information that is supplied in confidence, implicitly or explicitly, to a government institution by a third party;

[89] As this exemption only applies to information “supplied” “by a third party,” I must first determine if the U of S qualifies as a third party. “Third party” is defined in subsection 2(1)(j) of FOIP which states:

**2(1)** In this Act:

...

(j) “**third party**” means a person, including an unincorporated entity, other than an applicant or a government institution.

[90] The U of S is a local authority pursuant to subsection 2(1) of *The Local Authority Freedom of Information and Protection of Privacy Act* (LA FOIP). However, as I said in [Review Report 080-2018](#), there is nothing in FOIP that prevents a local authority under LA FOIP from qualifying as a third party under FOIP.

[91] In my office’s [Review Report 080-2018](#), I recommended that the Minister of Justice consider an amendment to the definition of third party in FOIP and LA FOIP so that they exclude both government institutions and local authorities under those acts. The concern is that FOIP and LA FOIP already include exemptions to protect information received from other governments (see section 13(2) of FOIP which applies to local authorities). To allow this information to also be treated as third party information under section 19 of FOIP, introduces a requirement for a formal notification process that results in delays in the access to information process that would not apply if subsection 13(2) of FOIP was claimed. This means that a public body, intent on delaying the process, can opt to apply the third party exemption provisions in lieu of the exemptions that protect information provided by another public body such as section 13 of FOIP.

[92] Applying the definitions set out above, I find that the U of S does not qualify as an applicant because it has not made an application for access to a record. Nor does it qualify as a government institution under FOIP. It qualifies as a “third party” pursuant to subsection 2(1)(j) of FOIP because it is a person other than an applicant or a government institution.

[93] I now turn to the other requirements for the application of this exemption. My office uses the following three-part test to determine if subsection 19(1)(b) of FOIP applies:

1. Is the information financial, commercial, scientific, technical or labour relations information of a third party?
2. Was the information supplied by the third party to a government institution?
3. Was the information supplied in confidence implicitly or explicitly?

*(Guide to FOIP, Ch. 4, pp. 198-209)*

[94] All three parts of the test must be met for the exemption to apply.

[95] For context, the U of S explained that VIDO is a research centre at the university dedicated to research and development aimed at the protection of health. It stated that it and VIDO participated in the trip to Germany to engage with established and potential new business partners, expand the scope of partnerships and identify funding opportunities. It stated that the mission was a “key component” of its strategic business development plan. It asserted that:

During exploration and once formalized, partnerships are often subject to extensive non-disclosure and confidentiality agreements, evidencing their sensitive and confidential nature.

[96] However, the U of S did not suggest that non-disclosure and confidentiality agreements with Trade and Export Development and its German partners were in place here.

[97] I now turn to an analysis of the three-part test.

***1. Is the information financial, commercial, scientific, technical or labour relations information of a third party?***

[98] As described in my office’s *Guide to FOIP*, Ch. 4 at page 204, “commercial information” is information relating to the buying, selling or exchange of merchandise or services. This can include third party associations, past history, references and insurance policies and pricing structures, market research, business plans, and customer records. One type of information included in the definition of commercial information is a third-party business’ experiences in commercial activities where this information has commercial value. It can also include lists of customers, suppliers or sub-contractors compiled by a third-party business for its use in its commercial activities or enterprises - such lists may take time and effort to compile, if not skill.

- [99] “Financial information” is defined in my office’s *Guide to FOIP*, Ch. 4 at page 204 as information regarding monetary resources, such as financial capabilities, assets and liabilities, past or present. Common examples are financial forecasts, investment strategies, budgets and profit and loss statements. The financial information must be specific to a third party.
- [100] The U of S asserted that the list of VIDO’s existing and potential business partners involved in funding, research and development is commercial information as it is akin to a customer list.
- [101] Trade and Export Development described VIDO’s work as “a highly competitive industry.” It asserted that the information qualified as commercial information because it revealed “third party associations.” It added that release of the names, job titles and names of affiliated organizations of the German partners, along with publicly available information, could provide an advantage to competitors over VIDO. It also added that releasing this information could enable competitors to determine the expertise of partners. It would also enable them to make accurate deductions regarding strategic or operational decisions of VIDO and the information could be used to surpass VIDO on business performance indicators.
- [102] In my office’s [Review Report 172-2019](#), I found that information about a third party’s funding sources qualified as financial information because it relates to budget. Information about funding requests and requirements was also found to qualify as “financial information” in my office’s [Review Report 220-2021, 235-2021](#).
- [103] Following the same approach, I find that the information at issue here qualifies as financial information. I now turn to the second part of the test.

- 2) *Was the information supplied by the third party to a government institution?*
- 3) *Was the information supplied in confidence implicitly or explicitly?*

- [104] To meet the second part of the test, the information must have been supplied. “Supplied” means provided or furnished (*Guide to FOIP*, Ch. 4, at p. 200).
- [105] The U of S stated that it provided information about its partners to Trade and Export Development for the purpose of scheduling meetings and developing the itinerary. It also stated that the list was provided with the expectation it would be kept confidential.
- [106] I am satisfied that the U of S provided the list of individuals and organizations to meet with during the mission to Trade and Export Development. Therefore, part two of the test has been met.
- [107] To meet the third part of the test, the information must have been supplied in confidence either implicitly or explicitly. “Implicitly” means that confidentiality is understood, even though there is no actual agreement or statement of confidentiality. “Explicitly” means confidentiality has been clearly stated, such as through documentary evidence showing the information was supplied with the understanding the government institution would keep it confidential. To meet this part of the test, public bodies must show that both parties intended the information to be held in confidence at the time the information was supplied (*Guide to FOIP*, Ch. 4, p. 202).
- [108] The expectation of confidentiality must be reasonable and must have an objective basis. Whether the information is confidential will depend upon its content, its purposes, and the circumstances in which it was compiled or communicated (*Guide to FOIP*, Ch. 4, p. 202).
- [109] There is no suggestion that the information at issue was supplied explicitly in confidence. Further, there is nothing on the face of the records that would suggest that there was an explicit expectation of confidentiality.
- [110] In determining if a record was supplied implicitly in confidence, as set out in my office’s *Guide to FOIP*, Ch. 4 at pages 208 to 209, my office will take into account the following factors:



- What is the nature of the information? Would a reasonable person regard it as confidential?
- Would it ordinarily be kept confidential by the government institution?
- Was the information treated consistently in a manner that indicated a concern for its protection by the government institution from the point it was obtained until the present time?
- Is the information available from sources to which the public has access?
- Does the government institution have any internal policies or procedures that speak to how records such as the one in question are to be handled confidentially?
- Was there a mutual understanding that the information would be held in confidence?

“Mutual understanding” means that the local authorities both had the same understanding regarding the confidentiality of the information at the time it was provided. If one party intends the information to be kept confidential but the other does not, the information is not considered to have been obtained in confidence. However, mutual understanding alone is not sufficient. Additional factors must exist.

[111] Regarding confidentiality, Trade and Export Development asserted that the information was not available publicly. It added that the information was received implicitly in confidence. It also stated that information of this nature is typically kept confidential where the organization is “in a competitive business space like that of VIDO.” Further it stated that the context in which it was provided by the U of S supports a finding of confidentiality. Namely that the purpose of the trip was to support prospective business opportunities and partnerships for Saskatchewan businesses and the U of S. It asserted that a reasonable person would regard this type of information as confidential, that this type of information would ordinarily be kept confidential, and it has been kept confidential.

[112] Even if I accept the assertion from the U of S that the VIDO’s efforts to seek funding for its work are made in a competitive environment, I note that VIDO releases information about current funding sources in its [Annual Reports](#) and in [news releases](#). In addition, there are media reports about its funding resources. For example, in December 2024, VIDO [announced](#) that it had received funding from an organization to conduct research on bird flu. Further, in an [article](#) that was published in the Saskatoon StarPhoenix on October 21,

2020, it was revealed that VIDO received funding from three named organizations for research on antiviral compounds.

[113] I also note that information about another trip to Germany to meet with German partners in early May 2024 was made publicly available in an [article](#) dated May 9, 2024 and posted on the U of S website. In that article, the U of S reported one of the purposes of the meeting was to “spearhead joint research innovations.” The headline refers to strengthening “international partnerships.” Information about the organizations that were included in the meetings was also revealed.

[114] Finally, information about the organizations that were withheld from the Group One records (itineraries) was made publicly available by Trade and Export Development in its “Out-of-Province Ministerial Travel” disclosure relating to this trip which appears to have been posted online in October of 2023. That document describes the purpose of the meetings and reveals the names of organizations that attended. While the names of the organizations involved were revealed, it appears that the names and job titles of individuals from those organizations who participated in the meetings were not released.

[115] Despite the fact that those names and job titles were not released in the “Out-of-Province Ministerial Travel” document, given the other information released and the circumstances outlined above, I am not persuaded that the withheld information has been and would ordinarily be kept confidential. Accordingly, I find that the information was not provided to Trade and Export Development implicitly in confidence.

[116] In conclusion, I find that the information was not supplied implicitly or explicitly in confidence and the third part of the test for the application of subsection 19(1)(b) of FOIP has not been met. Therefore, I find that subsection 19(1)(b) of FOIP does not apply to the withheld information.

[117] Before I make a recommendation, I will consider if subsections 19(1)(c)(ii) and (iii) of FOIP apply to the information.

[118] The existence of this publicly available information referred to above was uncovered by my staff because of its own research. It was not revealed to my office by Trade and Export Development or the U of S. Given the publicly available information about the organizations that the U of S and Trade and Export Development met with on this trip, I find that the decision to withhold this information from the Applicant surprising.

**6. Do subsections 19(1)(c)(ii) and (iii) of FOIP apply to the withheld information?**

[119] Trade and Export Development applied subsections 19(1)(c)(ii) of FOIP to the names, job titles and organizations of U of S's "German Business partners." The U of S claimed that both subsections 19(1)(b)(ii) and (iii) of FOIP applied. These are mandatory exemptions that permit refusal of access in situations where disclosure could reasonably be expected to result in the harms outlined at subclauses (ii) and (iii).

[120] Subsections 19(1)(c)(ii) and (iii) of FOIP state:

**19(1)** Subject to Part V and this section, a head shall refuse to give access to a record that contains:

...  
(c) information, the disclosure of which could reasonably be expected to:

...  
(ii) prejudice the competitive position of; or;

(iii) interfere with the contractual or other negotiations of;

a third party;

[121] As set out in my office's *Guide to FOIP*, Ch. 4 at pages 221 to 222, my office uses the following two-part test to determine if subsection 19(1)(c)(ii) of FOIP was properly applied:

1. What is the prejudice to a third party's competitive position that is being claimed?
2. Could release of the record reasonably be expected to result in the prejudice?

[122] The following two-part test to determine if subsection 19(1)(c)(iii) of FOIP was properly applied is set out in my office's *Guide to FOIP*, Ch. 4 at pages 226 to 227:

1. Are there contractual or other negotiations occurring involving a third party?
2. Could release of the record reasonably be expected to interfere with the contractual or other negotiations of a third party?

[123] I will summarize Trade and Export Development's submission on subsection 19(1)(c)(ii) of FOIP first. It asserted that the VIDO centre operates in a competitive commercial environment and in the past has sold products it developed. It stated that if competitors became aware of "the specific researchers working alongside VIDO on various projects" there would be a foreseeable loss of commercial opportunities and competitive advantage that would flow from the release of this information. The release of the information might lead to competitors having an edge over them.

[124] Regarding part two of the test, Trade and Export Development stated that:

The University indicated that releasing the names, job titles and names of affiliated organizations of the German partners, along with other publicly available information, could provide an advantage to competitors over VIDO. In other words, releasing information on the German partners could enable competitors [sic] determine the expertise of these partners, make fairly accurate deductions regarding the strategic and/or operational decisions of VIDO based on partner expertise or affiliated organizations, and leverage this knowledge to surpass VIDO on industry performance indicators which may potentially cause VIDO to experience financial losses.

[125] It added:

Due to the specialized nature of [VIDO's work], and the availability to VIDO's competitors of the research papers published by the academics listed in the withheld portions of the documents, VIDO's competitors could make use of publicly available information and combine that information with knowledge of who VIDO is partnering with, to determine where VIDO is focusing efforts in research and development.

The harms which could result from the use of this information are myriad, but include VIDO's competitors:

- Changing research plans and priorities to get a head-start on VIDO's research

- Shifting resources away from areas where VIDO is focusing research and development efforts, to prioritize areas which VIDO is not focusing on

- Hiring, poaching, head-hunting or otherwise inducing VIDO's partners to collaborate with VIDO's competitors.

[126] As noted earlier, Trade and Export Development did not claim that subsection 19(1)(c)(iii) of FOIP applied and its submission does not address it.

[127] The U of S's submission on the application of subsection 19(1)(c)(ii) of FOIP stated:

[VIDO's] research and development is highly competitive. Knowledge of existing and potential business partnerships discloses plans and strategy and gives competitors – not only VIDO's but those of their partners – insight into what we and our partners are doing and where. This information gives competitors an edge in competing with VIDO and our partners.

Competitive intelligence is often highly sought after and releasing information about VIDO's partners may cause those partners to look elsewhere for partnerships and contract work. Disclosing confidential information about partners will undermine VIDO's competitive position in the industry by negatively impacting VIDO's relationship with existing and potential partners.

For the same reason, VIDO's partnerships, contracts and associated information is not posted publicly on USask websites or elsewhere.

[128] Regarding the application of subsection 19(1)(c)(iii) of FOIP, U of S stated:

The purpose of this Mission was to build relationships with a view to future collaborations and funding opportunities. Disclosing this information, jeopardizing VIDO's relationship with these partners, will interfere with potential partnership and funding negotiations. Disclosing information about partnerships with partners adverse in interest or competitors of one another could reasonably be expected to interfere with the discussions between each partner and VIDO.

Not maintaining the confidence of our existing and potential partners will interfere with VIDO's negotiations with those partners.

For these reasons, USask submits that the names of our partners must be withheld.

[129] I will now turn to an analysis of the parties' claims that these exemptions apply. I have already found above that the U of S qualifies as a third party pursuant to subsection 2(1)(j)

of FOIP. Regarding part two of the test for the application of subsection 19(1)(c)(ii) of FOIP, my office's *Guide to FOIP*, Ch. 4 at pages 222 to 223, states:

“Could reasonably be expected to” means there must be a reasonable expectation that disclosure could prejudice the competitive position of a third party.

...

Exemption from disclosure should not be granted on the basis of fear of harm that is fanciful, imaginary, or contrived. Such fears of harm are not reasonable because they are not based on reason...the words “could reasonably be expected” “refer to an expectation for which real and substantial grounds exist when looked at objectively.”

[130] One of the factors to consider in determining if release could reasonably be expected to result in harm pursuant to subsections 19(1)(c)(ii) and (iii) of FOIP is whether the information or same subject matter has been disclosed elsewhere (*Guide to FOIP*, Ch. 4, pp. 223 and 229). This is an important factor here given that the arguments being made by the U of S and Trade and Export Development are that the release of the information could reasonably result in the specified harms.

[131] In this case the parties' claim that the release of the information to the Applicant could reasonably be expected to result in harm is difficult to understand when Trade and Export Development has already made information about the organizations that were involved in the meetings publicly available. Given the publicly available information about existing and prospective partnerships noted in paragraphs [112] through [114] above, I am not persuaded that release of this information to the Applicant could reasonably be expected to result in prejudice to the U of S's competitive position. Therefore, part two of the test for the application of subsection 19(1)(c)(ii) of FOIP has not been met and there is no need for me to consider part one.

[132] For the same reasons, I am not persuaded that release of this information could reasonably be expected to interfere with the contractual or other negotiations of U of S. Therefore, part two of the test for the application of subsection 19(1)(c)(iii) of FOIP has not been met. There is no need for me to consider if part one has been met.

[133] Accordingly, I find that subsections 19(1)(c)(ii) and (iii) of FOIP do not apply. I recommend that Trade and Export Development release the withheld information to the Applicant within 30 days of the issuance of this Report. Details are set out in the Appendix.

#### **IV FINDINGS**

[134] I find that I have jurisdiction to conduct this review.

[135] I find that Trade and Export Development did not demonstrate that exceptional circumstances exist to permit the late raising of a discretionary exemption.

[136] I find that the information withheld as non-responsive is responsive to the access to information request.

[137] I find that Trade and Export Development properly applied subsection 29(1) of FOIP in some cases but not all.

[138] I find that subsection 19(1)(b) of FOIP does not apply to the records.

[139] I find that subsections 19(1)(c)(ii) and (iii) of FOIP do not apply to the records.

#### **V RECOMMENDATIONS**

[140] I recommend that Trade and Export Development release the responsive records to the Applicant, subject to any exemptions that may apply, within 30 days of the issuance of this Report.

[141] I recommend that Trade and Export Development release the information that I have found is not exempt to the Applicant, within 30 days of the issuance of this Report, as set out in the Appendix.

[142] I recommend that Trade and Export Development continue to withhold the remaining information as set out in the Appendix.

Dated at Regina, in the Province of Saskatchewan, this 23<sup>rd</sup> day of January 2025.

Ronald J. Kruzeniski, K.C.  
A/Saskatchewan Information and Privacy  
Commissioner



### Appendix

Group One Page No.	Severance No.	FOIP Exemption Applied	Description	Findings and Recommendations
1	5	Non-responsive	Logistics	Responsive, release subject to exemptions
	6	Non-responsive	Travel time	Responsive, release subject to exemptions
	7	Non-responsive	Hotel information	Responsive, release subject to exemptions
2	1	29(1)	Hotel cost and inclusions	Not 29(1), release
	7	Non-responsive	Security Information	Responsive, release subject to exemptions
	9, 10, 15	Non-responsive	Logistics and hotel name	Responsive, release subject to exemptions
	11	Non-responsive	Hotel information	Responsive, release subject to exemptions
3	1, 3	Non-responsive	Travel Time	Responsive, release subject to exemptions
	2, 4	Non-responsive	Meeting address	Responsive, release subject to exemptions
	5	29(1)	Personal Information – meeting participants	Not 29(1), release
4	1, 5	Non-responsive	Travel Time	Responsive, release subject to exemptions
	2 and 6	Non-responsive	Business Address of meeting	Responsive, release subject to exemptions
	3, 7, 8	29(1)	Personal information – meeting attendees	Not 29(1), release
	4 and 9	Non-responsive	Gift	Responsive, release subject to exemptions
5	1, 2	Non-responsive	Travel Time	Responsive, release subject to exemptions
	3, 5, 6, 7, 8	Non-responsive	Business Address and travel time	Responsive, release subject to exemptions
	4	Non-responsive	Security Information	Responsive, release subject to exemptions

	9, 10	29(1)	Personal information – meeting attendees	Not 29(1), release
	11	Non-responsive	Gift	Responsive, release subject to exemptions
6	1, 3	Non-responsive	Business Address	Responsive, release subject to exemptions
	2	Non-responsive	Logistics	Responsive, release subject to exemptions
	5	19(1)(b), (c)(ii), (iii), 29(1)	Personal information - meeting attendees	Not 29(1), not 19(1)(c)(ii), release
7	1, 2, 6, 7	Non-responsive	Travel Time and business address	Responsive, release subject to exemptions
	3	29(1)	Personal information – meeting attendees	Not 29(1), release
	5	Non-responsive	Gift	Responsive, release subject to exemptions
8	1 to 3	29(1)	Personal information – meeting attendees	Not 29(1), release
	4, 5, 6, 7	Non-responsive	Travel time, meeting location	Responsive, release subject to exemptions
	12, 13	Non-responsive	Logistics	Responsive, release subject to exemptions
9	1, 4 to 8	Non-responsive	Logistics	Responsive, release subject to exemptions
	3, 9	29(1)	Personal information – meeting attendees	Not 29(1), release
10	1 to 3	29(1)	Personal information – meeting attendees	Not 29(1), release
	4	Non-responsive	Gift	Responsive, release subject to exemptions
	5, 6	Non-responsive	Logistics	Responsive, release subject to exemptions
11	1	Non-responsive	Travel time	Responsive, release subject to exemptions

	7	Non-responsive	SharePoint site link	Responsive, release subject to exemptions
12	5, 6	Non-responsive	Travel time and hotel logistics	Responsive, release subject to exemptions
	7	Non-responsive	Business address and hotel address	Responsive, release subject to exemptions
	9	Non-responsive	Hotel cost and inclusions	Responsive, release subject to exemptions
13	6	Non-responsive	SharePoint site link	Responsive, release subject to exemptions
14	1	Non-responsive	Security information	Responsive, release subject to exemptions
	3	Non-responsive	Travel time	Responsive, release subject to exemptions
	4, 5, 9, 10	Non-responsive	Logistics and travel time	Responsive, release subject to exemptions
15	1, 3	Non-responsive	Business address	Responsive, release subject to exemptions
	2	Non-responsive	Logistics	Responsive, release subject to exemptions
	4	29(1)	Personal information – meeting attendees	Not 29(1), release
16	1, 2, 5	Non-responsive	Travel time and address	Responsive, release subject to exemptions
	6	Non-responsive	Business address	Responsive, release subject to exemptions
	3, 7, 8	29(1)	Personal information – meeting attendees	Not 29(1), release
	4, 9	Non-responsive	Gift	Responsive, release subject to exemptions
17	1	Non-responsive	Travel time	Responsive, release subject to exemptions
	2, 3	Non-responsive	Logistics	Responsive, release subject to exemptions
	4	Non-responsive	SharePoint site link	Responsive, release subject to exemptions
18	1	Non-responsive	Security information	Responsive, release subject to exemptions
	2	Non-responsive	Hotel address	Responsive, release subject to exemptions
	3	Non-responsive	Travel time	Responsive, release subject to exemptions

	4, 5	Non-responsive	Logistics	Responsive, release subject to exemptions
	6, 7	29(1)	Personal information – meeting attendees	Not 29(1), release
	8	Non-responsive	Gift	Responsive, release subject to exemptions
19	1, 3	Non-responsive	Business address	Responsive, release subject to exemptions
	2	Non-responsive	Travel time	Responsive, release subject to exemptions
	5	19(1)(b), (c)(ii), (iii), 29(1)	Personal information of third party’s business partners	Not 29(1), not 19(1)(c)(ii), release
20	1, 5	Non-responsive	Travel time	Responsive, release subject to exemptions
	2, 6	Non-responsive	Business address	Responsive, release subject to exemptions
	3	29(1)	Personal information – meeting attendees	Not 29(1), release subject to exemptions
	5	Non-responsive	Gift	Responsive, release subject to exemptions
21	1, 2	29(1)	Personal information – meeting attendees	Not 29(1), release
	3	Non-responsive	SharePoint site link	Responsive, release subject to exemptions
22	1	Non-responsive	Logistics	Responsive, release subject to exemptions
	2, 5	Non-responsive	Business address	Responsive, release subject to exemptions
	3, 4	Non-responsive	Travel time	Responsive, release subject to exemptions
	10, 11, 12	Non-responsive	Logistics	Responsive, release subject to exemptions
23	1	Non-responsive	Business address	Responsive, release subject to exemptions
	3	29(1)	Personal information – meeting attendees	Not 29(1), release

	4	Non-responsive	Gift	Responsive, release subject to exemptions
	5	Non-responsive	SharePoint site link	Responsive, release subject to exemptions
24	1 to 4	Non-responsive	Logistics	Responsive, release subject to exemptions
	5, 7	29(1)	Personal information – meeting attendees	Not 29(1), release
	6	Non-responsive	Travel time	Responsive, release subject to exemptions
25	1	29(1)	Personal information – meeting attendees	Not 29(1), release
	2	Non-responsive	Gift	Responsive, release subject to exemptions
	3	Non-responsive	Travel time	Responsive, release subject to exemptions
	4	Non-responsive	SharePoint site link	Responsive, release subject to exemptions
<b>Group Two Page No.</b>		<b>FOIP Exemption Applied</b>	<b>Description</b>	<b>Findings and Recommendations</b>
3	1 to 2	29(1)	Names and email addresses of ministry staff	Not 29(1), release
9	1	Non-responsive	Airline Name	Responsive, release subject to exemptions
10	4	29(1)	Frequent flyer number	29(1) applies, continue to withhold
15	1	Non-Responsive	Hotel name and logo	Responsive, release subject to exemptions
	2	29(1)	Home address	29(1) applies, continue to withhold
	7	Non-Responsive	Handwritten note	Responsive, release subject to exemptions
16	1 to 2	Non-Responsive	Hotel name and logo	Responsive, release subject to exemptions
	3	29(1)	Home Address	29(1) applies, continue to withhold
	5, 16 to 19	29(1)	Hotel Room Number, head office and bank address	Not 29(1), release

17	2, 4	29(1)	Name of taxi driver and two addresses	Name of taxi service is responsive, release subject to exemptions; remaining information is not 29(1), release
	3	Non-responsive	Name of taxi service	Responsive, release subject to exemptions
18	1, 3, 5	29(1)	Name of driver, reason for discount and pick up and drop off addresses	Not 29(1), release
	4	Non-responsive	Name of taxi service, name of driver, reason for discount and pick up and drop off addresses	Responsive, release subject to exemptions
21	1, 2	29(1)	Names and email addresses of ministry staff	Names and email address are not 29(1), release
27, 29	All severances	Non-Responsive, 29(1)	Airline name and logo	Responsive, not 29(1), release
33	1	Non-responsive	Airline information	Responsive, release subject to exemptions
34	1 to 2	Non-responsive	Hotel name and address, information	Responsive, release subject to exemptions
	4	29(1)	Hotel room number	Room number not 29(1), release
35	1, 6	Non-responsive	Hotel information, handwritten note	Responsive, release subject to exemptions
	2	29(1)	Hotel room number	Not 29(1), release
	3	29(1)	Loyalty card number	29(1) applies to loyalty card number, continue to withhold;
	13 to 14	29(1)	Hotel address and contact details	Not 29(1), release
41	1	29(1)	Name of airline and logo	Not 29(1), release
45	1	Non-responsive	Hotel name,	Responsive, release subject to exemptions
	2	29(1)	Hotel room number	Not 29(1), release
	4	29(1)	Loyalty card number	29(1) applies, continue to withhold

	15, 16	29(1)	Hotel address, head office and banking information	Not 29(1), release
46	1, 2, 6	Non-responsive applied to 1 and 2, 29(1) applied to 6	Hotel name and address and room number	Hotel name and address responsive, release subject to exemptions; Room number not 29(1), release
	3	29(1)	Home address	29(1) applies to home address, continue to withhold,
	14 to 18	29(1)	Hotel, head office and banking address information	Not 29(1), release
47	1, 2, 3	Non-responsive applied to 1 and 2; 29(1) applied to 3	Hotel name, contact details and banking information	Severances 1 and 2 are responsive; release subject to exemptions; severance 3 is not 29(1), release
53	1	Non-responsive	Airline information	Responsive, release subject to exemptions
55	1 to 2	Non-responsive	Hotel name and address	Hotel name and address is responsive, release subject to exemptions
	3	29(1)	Home address	29(1) applies to home address, continue to withhold
	5	29(1)	Hotel room number	Not 29(1), release
	14 to 17	29(1)	Hotel, head office and bank address information	Not 29(1), release
56	1, 6	29(1)	Hotel name and room number	Not 29(1), release
	2	Non-responsive	Name of hotel chain	Responsive, release subject to exemptions
	3	29(1)	Home address	29(1) applies to home address, continue to withhold
	17 to 20	29(1)	Hotel, head office and bank contact details	Not 29(1), release
57	1, 2	Non-responsive	Hotel name and hotel chain	Responsive, release subject to exemptions;
	3 to 6	29(1)	Hotel, head office and bank address information	Not 29(1), release

60	1, 3, 4	29(1)	Hotel name and room number and loyalty card number	29(1) applies to loyalty card number, continue to withhold, 29(1) does not apply to hotel name and room number
	13-14	29(1)	Hotel, head office and bank address information	Not 29(1), release
61	1	29(1)	Address	Not 29(1), release
63	4	Non-responsive	Exchange rate	Responsive, release subject to exemptions
64	3	29(1)	Home address	29(1), continue to withhold
	2	Non-Responsive	Hotel name	Responsive, release subject to exemptions