



REVIEW REPORT 131-2020, 142-2020

Provincial Capital Commission

July 5, 2022

Summary:

The Applicant submitted an access to information request to the Provincial Capital Commission (PCC) regarding access to records related to a proposed CNIB/Brandt Industries development project that was under consideration by the PCC. PCC responded and withheld information pursuant to sections 17(1)(a), (f)(i) and (ii) of *The Freedom of Information and Protection of Privacy Act* (FOIP). The Applicant requested the Commissioner review PCC's decision to withhold the records in full. The Applicant also requested the Commissioner review PCC's search efforts. The Commissioner found that PCC properly applied section 17(1)(a) of FOIP to parts of the records, but not in all cases. The Commissioner also found that PCC did not properly apply sections 17(1)(f)(i) and (ii) of FOIP to the records. Further, the Commissioner found that PCC conducted a reasonable search to locate records responsive to the Applicant's access to information request. The Commissioner recommended that PCC release the information that was not properly exempted pursuant to sections 17(1)(a), (f)(i) and (ii) of FOIP to the Applicant, but continue to withhold the rest of the information already withheld. The Commissioner also recommended that PCC take no further action to search for records responsive to the Applicant's access to information request.

I BACKGROUND

- [1] The Commissioner has identified a potential conflict with the subject material of the record in review. The Commissioner has taken no part in this review and has delegated the Deputy Commissioner to make all decisions related to this review. The only thing that will occur is that the final Report will go under the Commissioner's name after being reviewed and approved by the Deputy Commissioner.

[2] On February 13, 2020, the Provincial Capital Commission (PCC) received the following access to information request from the Applicant:

Regarding the proposed CNIB/Brandt Industries development project currently under consideration by the PCC:

- 1) Comments and recommendation provided to the PCC Board by the Architectural Advisory Committee [AAC] regarding the Statement of Intent submitted by the proponent (Steps 9-11 of the PCC Development Process Review Framework).
- 2) Comments, report, and recommendation provided to the PCC Board by the AAC regarding the Conceptual Design submitted by the proponent (Steps 19-20 of the PCC Development Process Review Framework).
- 3) Minutes of the Provincial Capital Commission meeting of November-December 2018.
- 4) Any resolution or other document amending the Wascana Centre Master Plan to accommodate the development.

[3] On March 12, 2020, PCC responded to the Applicant's access to information request indicating it was withholding in full records related to numbers 1), 2) and 3) of the Applicant's access to information request pursuant to sections 17(1)(f)(i) and (ii) of *The Freedom of Information and Protection of Privacy Act* (FOIP). Regarding number 4) of the access to information request, PCC indicated the following:

In response to 4), a resolution was not passed, however, public documents of the Wascana Centre Master Plan 2006 and Wascana Centre Master Plan 2016 (attached), outline the replacement building as part of the regular Master Plan Renewal cycle. As part of the regular Master Plan Renewal, the Wascana Centre Authority at the time, administered public consultations.

[4] On April 30, 2020, the Applicant wrote to PCC to request a reconsideration of the release of the records sought in items numbered 1) and 2) of the access to information request.

[5] On May 14, 2020, PCC responded to the Applicant's request for reconsideration with a revised response indicating that it was including section 17(1)(a) of FOIP as one more reason for withholding the records.

- [6] On May 21, 2020, the Applicant submitted a request for review to my office. The Applicant requested that my office review the response PCC provided for numbers 1) and 2) of their access to information request.

- [7] On June 10, 2020, the Applicant requested that my office add the search efforts of PCC to the scope of our review.

- [8] On June 15, 2020, my office emailed a request for review form to the Applicant so they could include the search efforts of the PCC within the scope of review.

- [9] On June 17, 2020, the Applicant sent the request for review form to my office. On the form, the Applicant requested that my office review the adequacy of the search efforts by PCC to find responsive documents.

- [10] On June 22, 2020, my office provided notification to the Applicant and PCC of my office’s intent to undertake a review of PCC’s application of sections 17(1)(a), (f)(i) and (ii) of FOIP and the search efforts by PCC to find responsive records.

II RECORDS AT ISSUE

- [11] On August 12, 2020, PCC advised that, “we have found two additional documents that have been added to the Index of Records”. PCC withheld information in full on four different records that were responsive to the Applicant’s access to information request. The following Index of Records (Index) updated by the PCC on August 4, 2020, describes the records PCC withheld and the FOIP sections it applied to the information:

Record Number	Page Range	General Description	Status	Exemption(s) applied
1	3	August 24 th , 2015 CNIB Proposal to Construct a New Building on their Current Site in Wascana Centre (September 16, 2015)	Withheld in full	17(1)(a), 17(1)(f)(i), 17(1)(f)(ii) of FOIP

2	2	Wascana Centre Authority Architectural Advisory Committee Review CNIB / Brandt Developments Ltd. Phase B Submission Response (September 07, 2016) (September 29, 2016)	Withheld in full	17(1)(a), 17(1)(f)(ii) of FOIP
3	1	Summary Architectural Advisory Committee Advise to the WCA Board of Directors (November 26, 2014)	Withheld in full	17(1)(a), 17(1)(f)(ii) of FOIP
4	3	Wascana Centre Architectural Advisory Committee Advice Culliton Centre Replacement AAC Advice to the WCA Board of Directors (November 19, 2014)	Withheld in full	17(1)(a), 17(1)(f)(ii) of FOIP

[12] This review will also consider PCC’s search efforts as the Applicant does not believe that all responsive records were located.

III DISCUSSION OF THE ISSUES

1. Do I have jurisdiction?

[13] PCC qualifies as a “government institution” pursuant to section 2(1)(d)(ii) of FOIP and section 3 and Part I of the Appendix of *The Freedom of Information and Protection of Privacy Regulations* (FOIP Regulations). Therefore, I have jurisdiction to conduct this review.

[14] In my office’s [Review Report 135-2019](#), I noted the following:

[8] I also note that there are responsive records related to the Provincial Capital Commission (PCC) which was known as the Wascana Centre Authority at the time the records were created. PCC qualifies as a government institution pursuant to subsection 2(d)(ii) of FOIP. I will refer to the Wascana Centre Authority as PCC in the remainder of this Report.

[15] As this case is similar to that depicted above, I will also refer to the Wascana Centre Authority as the PCC in this Report.

2. Did PCC properly apply section 17(1)(a) of FOIP to the records?

[16] PCC withheld in full all four records listed in the Index described in paragraph [11] of this Report pursuant to sections 17(1)(a) of FOIP.

[17] Section 17(1)(a) of FOIP provides:

17(1) Subject to section (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;

[18] Section 17(1)(a) of FOIP is a discretionary class-based exemption. It permits refusal of access in situations where release of a record could reasonably be expected to disclose advice, proposals, recommendations, analyses or policy options developed by or for a government institution or a member of the Executive Council (*Guide to FOIP*, Chapter 4: “Exemptions from the Right of Access”, updated: April 30, 2021, at page 123 [*Guide to FOIP*, Ch. 4.]).

[19] My office uses the following two-part test to determine if section 17(1)(a) of FOIP applies:

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

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

(*Guide to FOIP*, Ch. 4, pp. 124-126)

[20] Below, I will determine if section 17(1)(a) of FOIP applies to the four records that were withheld in full.

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

[21] In its submission to my office, PCC asserted that the information withheld in full from all four records constitute advice, recommendations and/or analyses.

[22] “Advice” is guidance offered by one person to another. It can include the analysis of a situation or issue that may require action and the presentation of options for future action, but not the presentation of facts. It includes expert opinion on matters of fact on which a government institution must make a decision for future action. A “recommendation” is a specific piece of advice about what to do, especially when given officially. “Recommendations” relate to a suggested course of action more explicitly and pointedly than “advice”. It includes suggestions for a course of action as well as the rationale or substance for a suggested course of action. A “proposal” is something offered for consideration or acceptance. “Analyses” is the detailed examination of the elements or structure of something; the process of separating something into its constituent elements (*Guide to FOIP*, Ch. 4, pp. 124 – 125).

[23] In its submission to my office, PCC stated the following:

...The records constitute as advice from the Architectural Advisory Committee (AAC) to the Wascana Centre Authority (WCA) Board of Directors. The records are submitted as advice and other recommendations, however, the Board of Directors weighs the advice and opinions in their decision making. The Board of Directors is not bound by their recommendation but considers it when weighing the significance of the facts. In the documents, recommendations are included in the advice and do suggest a specific course of action. These documents also constitute as analyses as they offer a detailed examination of the development project with Wascana Centre as it relates to the Master Plan...

[24] In its submission, PCC further asserted the following regarding Record 1:

This record provides advice to the WCA Board.... It also provides specific references to prior advice and is echoing what the committee used in their meeting advice document to the Board...

[25] When I reviewed the record, certain information stood out as separate and apart from the rest of the content. In Record 1, the signature line and headers include the names and positions of government employees, the work address, work telephone numbers and work

email addresses cannot be described as advice, recommendations or analyses. In Record 2, the document title, dates and names of government employees in the signature line do not qualify as advice, recommendations or analyses. In Record 3, the document title, names of government employees in the signature line and dates do not qualify as advice, recommendations or analyses. In Record 4, the document title, names of people in attendance including the name in the signature line and date do not qualify as advice, recommendations or analyses. The information above from all four records does not meet the first part of the test requirements of section 17(1)(a) of FOIP. I will analyze this information under section 17(1)(f)(i) and (ii) of FOIP.

[26] In terms of the rest of Record 1, the information after the first paragraphs includes analyses and expert opinions given about an organization's proposal to build a facility. This information also includes several suggested courses of action for meeting certain building construction targets. This information is advice, recommendations and analyses. Paragraph 1 of Record 1, however, cannot be described as advice, recommendations or analyses as this is a description of the Architectural Advisory Committee's (AAC) review process parameters and compliance rules. Therefore, I find that everything but paragraph 1 meets the first part of the test. In the next paragraph of this Report, I will determine if part 2 of the test applies to all the information except for paragraph 1 of Record 1. As the PCC also applied sections 17(1)(f)(i) and (ii) of FOIP to this information, I will consider it again under these provisions.

[27] Except for the summary paragraph, Record 2 includes the examination of a building project proposal in relation to pre-determined standards. These pre-determined standards can be described as elements of the Wascana Centre Master plan and physical building standards. The information also includes suggestions on how the Canadian National Institute for the Blind (CNIB) can meet building standards. This part of the record can be described as analyses and advice. The summary paragraph of Record 2 can be described as general proposal requirements that will inform recommendations made by the AAC. As this information does not qualify as advice, analyses or recommendations, the first part of the test is not met. However, as the PCC also applied section 17(1)(f)(ii) of FOIP to this information, I will consider the summary paragraph under that provision. Later on in this

Report, I will determine if part 2 of the test applies to Record 2, except for the summary paragraph.

- [28] From a review of Records 3 and 4, the information includes a breakdown of various parts of a proposal, a critical examination of some of the proposal elements by CNIB and informed opinions on ideal courses of action. This information constitutes analyses, advice and recommendations, with a few exceptions. The first exception is the following in Record 3: the first and second paragraphs which highlight actions taken by AAC and CNIB. This does not constitute advice, proposals, recommendations, analyses or policy options. The second exception is Record 4 as follows: The “Design Stage” paragraph constitutes an update which also does not constitute advice, proposals, recommendations, analyses or policy options. As the PCC applied sections 17(1)(f)(i) and (ii) of FOIP to this information, I will consider it again under those sections. Except for the exceptions noted above, the first part of the test is met for Records 3 and 4.

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

- [29] PCC advised that the “transition from Wascana Centre Authority to Provincial Capital Commission was formalized with the adoption of *The Provincial Capital Commission Act* (see section 2-2) and the repeal of *The Wascana Centre Act*, effective June 12, 2017”. Since I am considering what existed at the time the records were generated, I need to consider to what extent *The Wascana Centre Act* (WCA) may have applied then. In particular, section 13(1) of the WCA provided:

13(1) The Authority shall, upon any terms and conditions it considers advisable, appoint:

- (a) an advisory committee to be known as the **Architectural Advisory Committee** consisting of two or more persons, each of whom shall, subject to subsection (2), be an architect, a landscape architect or a community planner.

[Emphasis added]

[30] This would be consistent with the conclusion made in my office's [Review Report 188-2019](#) at paragraph [82], which was that the AAC was a committee of the former Wascana Centre Authority.

[31] "Developed by or for" means the advice, proposals, recommendations, analyses and/or policy options must have been created either: 1) within the government institution, or 2) outside the government institution, but for the government institution and at its request. For information to be developed by or for a government institution, the person developing the information should be an official, officer or employee of a government institution, be contracted to perform services, be specifically engaged in an advisory role or otherwise have a sufficient connection to the government institution (Guide to *FOIP*, Ch. 4, p. 126 - 127).

[32] As stated earlier, PCC stated the following:

...The records constitute as advice from the Architectural Advisory Committee (AAC) to the Wascana Centre Authority (WCA) Board of Directors.

[33] From a review of the four Records, information in the heading and signature sections suggests that the advice, recommendations and/or analyses described were developed by the AAC for the WCA, now the PCC. Therefore, the information described as advice, recommendations, proposals, and/or analyses from Records 1, 2, 3 and 4 were developed by a government institution.

[34] I note however in their August 4, 2020 submission, the Applicant's legal counsel argued,

...even in cases where the wording in s. 17(1) applies, s. 17(2) bars the application of that section to certain classes or records. In this case, s. 17(2)(b) applies to protect the disclosure requirements related to decisions made by the AAC for the consideration of the PCC board.

[35] The PCC argues that section 17(2)(b) of FOIP does not apply "as they are not official records of a decision". I agree. Since both parts of the test are met, I find that PCC properly applied section 17(1)(a) of FOIP to the information after the first paragraph of Record 1. I also find that PCC properly applied section 17(1)(a) of FOIP to the information on Record

2, minus the summary paragraph, but also to Records 3 and 4, minus the information described as factual/other in paragraph [28] of this Report. I recommend PCC continue to withhold this information.

3. Did PCC properly apply section 17(1)(f) of FOIP to the records?

[36] Section 17(1)(f) of FOIP provides:

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

...

(f) agendas or minutes of:

(i) a board, commission, Crown corporation or other body that is a government institution; or

(ii) a prescribed committee of a government institution mentioned in subclause (i);

[37] Section 17(1)(f) of FOIP is a discretionary class-based exemption. It permits refusal of access in situations where release of a record could reasonably be expected to disclose agendas or minutes of a board, commission, Crown corporation or other body that is a government institution or a prescribed committee of a government institution. The provision is intended to protect agendas and/or meeting minutes as they relate to decision-making within the bodies listed (*Guide to FOIP*, Ch. 4 p. 147).

[38] My office uses the following two-part test to determine if section 17(1)(f) of FOIP applies:

1. Is the record an agenda of a meeting or minutes of a meeting?

2. Are the agendas or minutes of:

i) a board, commission, Crown corporation or other body that is a government institution?

ii) a prescribed committee of a board, commission, Crown corporation or other body that is a government institution?

[39] Below, I will determine if section 17(1)(f)(i) or (ii) of FOIP applies to paragraph 1 of Record 1. I will also determine if section 17(1)(f)(ii) of FOIP applies to the summary paragraph of Record 2, the information described as factual/other information in Records 3 and 4 and the following information from all the records – names and positions of government employees, work addresses, work telephone numbers, work email addresses, document titles and dates.

1. Is the record an agenda of a meeting or minutes of a meeting?

[40] In its submission to my office, PCC asserted that the information withheld in full constitutes minutes of AAC meetings.

[41] “Minutes” are memoranda or notes of a transaction, proceeding or meeting; the formal record of a deliberative assembly’s meeting, approved by the assembly; the record of all official actions taken (*Guide to FOIP*, Ch. 4, p. 148).

[42] Minutes of meetings can be revealed in two ways:

1. The information itself consists of meeting minutes; or
2. The information, if disclosed, would permit the drawing of accurate inferences as to the content of the actual meeting minutes.

(*Guide to FOIP*, Ch. 4, p. 147)

[43] PCC submitted the following regarding the information withheld:

Record 1:

It also provides specific references to prior advice and is echoing what the committee used in their meeting advice document to the Board, equivalent to minutes of the AAC to the Board Chair/Committee.

Records 2 and 3:

This document is referenced as a review and provides information that would inference direct meeting minutes and acts as an equivalent to AAC minutes. This review acts as the formal record of official actions taken.

[44] From a review of the Records, the first paragraph of Record 1, the summary paragraph of Record 2, and the factual/other information of Records 3 and 4 do not appear to be derived from meetings of AAC members. Further, none of the four records are officially titled minutes. Also, in order to make the case that the Records “would inference with direct meeting minutes,” PCC could have provided a copy of the meeting minutes that would be revealed. Pursuant to section 61 of FOIP, PCC bears the burden of proof in demonstrating that the exemption applies. It failed to do so in these cases. I find that the first part of the test is not met. Further, in all four records, the names and positions of government employees, the work addresses, work telephone numbers and work email addresses are publicly available information. The first paragraph of Record 1, the summary paragraph of Record 2, the factual/other information of Records 3 and 4, the publicly available information, the document titles and/or dates do not qualify as minutes of a meeting. As the first part of the test is not met, I will not analyze the second part of the test. I find that PCC did not properly apply sections 17(1)(f)(i) or (ii) to the information. I recommend that PCC release this information to the Applicant.

4. Did PCC conduct a reasonable search for records?

[45] Section 5 of FOIP provides as follows:

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

[46] Section 5.1(1) of FOIP requires a government institution to respond to an Applicant’s access to information request openly, accurately and completely. This means that government institutions should make reasonable effort to not only identify and seek out records responsive to an Applicant’s access to information request, but to explain the steps in the process (*Guide to FOIP*, Chapter 3, “Access to Records”, updated June 29, 2021 [*Guide to FOIP*, Ch. 3], p.7).

[47] 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. 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. A reasonable effort is the level of effort you would expect any fair, sensible person searching areas where records are likely to be stored. What is reasonable depends on the request and related circumstances (*Guide to FOIP*, Ch. 3, p. 7).

[48] When a government institution receives a notification letter or email from my office requesting details of its search efforts, some or all of the following can be included in the submission:

- For personal information requests – explain how the individual is involved with the government institution (i.e. client, employee, former employee, etc.) and why certain departments/divisions/branches/committees/boards were included in the search.
- Identify the employee(s) involved in the search and explain how the employee(s) is(are) experienced in the subject matter.
- Explain how the records management system is organized (both paper and electronic) in the departments/divisions/branches/committees/boards included in the search.
- Describe how records are classified within the records management system. For example, are the records classified by: alphabet, year, function, subject?
- Consider providing a copy of your organization’s record schedule and screen shots of the electronic directory (folders & subfolders).
- If the record has been destroyed, provide copies of the record schedules and/or destruction certificates.
- Explain how you have considered records stored off-site.
- Explain how records that may be in the possession of a third party but in the local authority’s control have been searched such as a contractor or information management service provider.
- Explain how a search of mobile electronic devices was conducted (i.e. laptops, smart phones, cell phones, tablets).

- Explain which folders within the records management system were searched and how these folders link back to the subject matter requested. For electronic folders – indicate what key terms were used to search if applicable.
- Indicate the calendar dates each employee searched.
- Indicate how long the search took for each employee.
- Indicate what the results were for each employee search.
- Consider having the employee that is searching provide an affidavit to support the position that no record exists or to support the details provided.

(*Guide to FOIP*, Ch. 3, pp. 9-10)

[49] The above list is meant to be a guide. Providing the above details is not a guarantee that my office will find the search conducted was reasonable. Each case will require different search strategies and details depending on the records requested.

[50] In its submission to my office, PCC provided details of its search efforts. This included the scope of the search and search categories as follows:

In response, this request was received on February 13, 2020 and was shared with our subject matter expert, [former PCC employee], then Director of Stewardship and Operations for the PCC. He was responsible for facilitating and collaborating with proponents on projects in development in Wascana Centre. The records kept in this area are mostly digital and so he searched through his electronic filing...

The PCC has endeavoured to improve its records management processes and has hired a Coordinator to create a records management system for the PCC to assist with subject matter cataloguing, retention schedules and training of staff. To that end, when this notice of review was received, we again conducted a search and had our Records Management Coordinator go through our records to ensure our search was thorough. As a result of this search, we have found two additional documents that have been added to the Index of Records (attached) that are responsive to this request. We are claiming, however, exemption due to section 17(1)(a) of *The Freedom of Information and Protection of Privacy Act*.

The search conducted by the Administrative and Records Management Coordinator included, at minimum, a seven hour search that included an electronic search of the records on file within the Development drive; an electronic search of records located on the old server; and a search of paper-based records on the project; scanning and adding missing documents to the electronic file. As well, records have been reviewed

and organized over the past several months (February to June) into an electronic file data base specific to this project. This work, again because of the complexity of project developments, has necessitated additional resources to organize documents specifically into the 38-step process which if referenced is available for review on our website at <https://www.saskatchewan.ca/government/government-structure/boards-commissions-and-agencies/provincial-capital-commission>.

Additionally, software to source duplicate documents was used to uncover, compare and ensure documents were filed appropriately. As part of the search undertaken by the Records Management Coordinator, another review of [former PCC employee]’s emails was conducted to determine if other documentation was pertinent. There was also a comparison conducted of past processes and terminology, regarding development projects, to determine how documents would align with the new process.

The additional records found by the Records Management Coordinator, have been added to the Index of Record as responsive records, however, in reference to section 17(1)(a) of *The Freedom of Information and Protection of Privacy Act*, these records provide advice, proposals, recommendations and analyses from the Architectural Advisory Committee to the Wascana Centre Authority Board of Directors, and will also be withheld in full.

[51] In my office’s [Review Report 159-2019](#) at paragraph [16], I stated that applicants set the parameters of their search request, so public bodies can conduct a reasonable search for records. As such, there is some onus on the applicant to establish their basis for believing further records exist, such as providing supporting evidence to my office.

[52] My office invited the Applicant in this matter to provide a submission on why they believed additional records should exist. The applicant submitted the following to my office:

We are aware of two documents provided to the PCC (then Wascana Centre Authority) Board by the AAC containing reviews of the project in question, which should be captured by our request. More such documents, of which we are unaware, may exist.

We further understand that at least two versions of Record #2, titled “Wascana Centre Authority Architectural Advisory Committee Review CNIB/Brandt Developments Ltd. Phase B Submission Response (September 07, 2016)”, have been submitted to the Board. We are aware of one version dated sometime in the fall of 2016 and another dated sometime in the spring of 2017. It is possible that a request was made to withdraw the latter, but given that it was provided to the Board’s representative, [board representative’s name], it should be considered to fall within the scope of our request. More versions may exist. Only one version is listed in the Index of Records, and is unclear to which version the Index refers.

We anticipate that the above were accompanied with attaching e-mails and that there may have been a back-and-forth between PCC/WCA management, AAC members, and the Board regarding the above-discussed AAC reviews. These are comments made by the AAC regarding the project, and should be treated as records responsive to our request.

[53] Based on my review of the search efforts provided by PCC, I find that PCC conducted a reasonable search to locate records responsive to the Applicant's access to information request.

IV FINDINGS

[54] I find that the PCC appropriately applied section 17(1)(a) of FOIP to some of the information in Records 1, 2, 3 and 4.

[55] I find that the PCC did not properly apply sections 17(1)(a), 17(1)(f)(i) and (ii) of FOIP to paragraph 1 of Record 1, the summary section of Record 2, the factual/other information in Records 3 and 4, and the names, positions of government employees, work addresses, work telephone numbers, work email addresses, document titles and dates found in Records 1, 2, 3 and 4.

[56] I find that PCC conducted a reasonable search to locate records responsive to the Applicant's access to information request.

V RECOMMENDATIONS

[57] I recommend that PCC release paragraph 1 of Record 1, the summary section of Record 2, the factual/other information in Records 3 and 4, and the names and positions of government employees, work addresses, work telephone numbers, work email addresses, document titles and dates found in Records 1, 2, 3, and 4 to the Applicant, but continue to withhold the rest of the information already being withheld.

[58] I recommend that PCC take no further action to search for records responsive to the Applicant's access to information request.

Dated at Regina, in the Province of Saskatchewan, this 5th day of July, 2022.

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