



Office of the
Saskatchewan Information
and Privacy Commissioner

REVIEW REPORT 188-2025¹

Saskatchewan Government Insurance

June 17, 2026

Summary:

Saskatchewan Government Insurance (SGI) sent a letter to the Applicant informing them that a claim had been filed against them with respect to a motor vehicle accident. SGI found the Applicant to be responsible for the damages. The Applicant submitted an access to information request (Access Request 1) to SGI requesting records regarding their claim. SGI responded to Access Request 1. The Applicant was dissatisfied with the disclosed records because the identity of the other party was withheld and was information about the other party's vehicle.

The Applicant submitted Access Request 2 for "all forms, policies, procedures & documentation for adjusting, assessing, determining liability clear recovery claims". SGI responded to Access Request 2, but the Applicant remained dissatisfied.

The Applicant submitted Access Request 3 that asked for the *exact information* that was specifically used, referenced, in the claim. SGI responded that no records exist. The Applicant requested that the Office of the Saskatchewan Information and Privacy Commissioner (OIPC) review SGI's response to Access Request 3.

Around the same time, the Applicant submitted Access Request 4 for all information in relation to their claim file. SGI responded and provided the Applicant access to all but five pages filed on the Applicant's claim file. The five pages were provided to the Applicant partially redacted. The Applicant also requested that OIPC review SGI's response to Access Request 4.

The Applicant has not requested a review of the decision made with respect to Access Request 1 or 2.

¹ The other case file number associated with this Review Report is 079-2026.

The Commissioner found that SGI:

- (1) did not conduct a reasonable search for records responsive to Access Request 3;
- (2) properly applied section 17(1)(a) of *FOIP* to two pages responsive to Access Request 4;
- (3) properly applied section 29(1) of *FOIP* to two pages responsive to Access Request 4;
- (4) properly applied 17(1)(b)(i) of *FOIP* to two pages responsive to Access Request 4; and
- (5) did not meet its duty to assist.

The Commissioner recommended that SGI conduct a search for records in any cross files associated with the Applicant's claim file and provide the Applicant with access to such records, subject to exemptions set out in *FOIP*, within 30 days of issuance of this Report.

The Commissioner recommended that SGI continue to refuse the Applicant access to the portions of the records it redacted pursuant to sections 17(1)(a), (b)(i) and 29(1) of *FOIP*.

I BACKGROUND

- [1] In a letter dated May 5, 2022, Saskatchewan Government Insurance (SGI) informed the Applicant that a claim had been filed alleging a motor vehicle accident that occurred on March 28, 2022. SGI requested that the Applicant contact SGI as soon as possible.
- [2] In an email dated November 9, 2022, SGI informed the Applicant that SGI had determined the Applicant was responsible for damages in connection with the filed claim.
- [3] On the same day, the Applicant emailed SGI saying:

SGI will need to send me the file all particulars of how this conclusion was reached. Including any and all technical data.

- [4] On November 14, 2022, SGI responded to the Applicant instructing them to complete and submit a *Freedom of Information Request Form*. On the same day, the Applicant queried SGI why this was necessary. On November 16, 2022, SGI responded:

Personal information is collected under The Freedom of Information and Protection of Privacy Act and will be used or disclosed only as necessary to respond to your request. Therefore to release the full information of the claim you will need to fill out the “freedom of Information Request Form” to be reviewed. Regardless of the information is about you or not we must follow the Protection of Privacy Act.

- [5] The Applicant subsequently submitted four access to information requests to SGI.

Access Request 1

- [6] On November 21, 2022, the Applicant submitted the following access to information request to SGI: ²

all none personal information on file claim [claim number]. Information regarding how it was determined my vehicle caused the damage. All information about the other persons vehicle. Any investigation findings or other. All photos of both vehicles, measurements, conclusions, or estimations, assumptions. Basically all information that isnt considered protected. Any information that isn't provided I would like to know high level what that is and why it is not being provided.

- [7] SGI responded to the access request on December 08, 2022, by granting partial access to 92 pages of responsive records. SGI cited sections 17(1)(a) and (b) of *The Freedom of Information and Protection of Privacy Act*³ (FOIP) as its reason for refusing access to portions of the responsive records.
- [8] After receiving this response, the Applicant was dissatisfied. The Applicant emailed SGI several times asserting that SGI had not provided all information regarding the claim, including information with respect to the other party's vehicle.

² The use of square brackets in this Report by OIPC are to preserve the identity of the Applicant.

³ [*The Freedom of Information and Protection of Privacy Act*](#), S.S., 1990-91 c F-22.01, as amended.

[9] We summarize those communications below because this information becomes relevant later in this Report when we analyze a government institution’s duty to assist:

Date of Applicant’s email to SGI	Contents of Applicant’s email
January 23, 2023	<p>I have received the package from sgi with some information regarding the claim. There is a notable amount of information missing regarding how the conclusion was reached of blame. Technical information is [m]issing regarding the other persons vehicle, including measurement photos. I had requested all information regarding this matter and it appears to be withheld, information that is not part of the privacy act. Please advise when this information will be sent.</p>
January 26, 2023	<p>As stated previously in emails information is certainly missing from the information sgi sent to me. There is zero information regarding the technical assessment of the other parties vehicle and how determination was made.</p> <p>Sgi has basically sent me back the information I gave to sgi, how ridiculous is this.</p> <p>How come is sgi playing unknowing and uncertain of what possibly could be missing.</p> <p>Is the freedom of information act not clear on this to sgi?</p> <p>I would like a summary of what sgi as an institution considers to be private and or confidential information. Or information it is unable to send for other reasons.</p> <p>Will sgi be sending this information. Confirm yes or no on the next email.</p>

[10] In an email dated January 27, 2023, SGI responded to the Applicant:

In reviewing the claim files, you were found to be at fault as the damages caused to the other party’s vehicle align to your vehicle along with there being matching paint transferred onto the other party’s vehicle. Based on the information that SGI has, you had been determined to be liable for these damages.

If you do not agree with SGI’s liability decision you can pursue going through Small Claims Court or Appealing your points.

[11] The Applicant continued to assert SGI was withholding documentation regarding the claim, especially the information about the other party’s vehicle:

Date of Applicant’s email to SGI	Contents of Applicant’s email
February 9, 2023	<p>Please explain why measurements, photos, from other parties vehicle and paper work regarding this has not been given as part of this request? There would be some criterion for drawing conclusions that have been made, that have been provided as part of this request.</p> <p>The information given is certainly not the only information on this file. I will state again why is sgi with holding this information? And basically not telling the truth.</p>
February 9, 2023	<p>...to be clear I have stated for the second time now. I am not asking for the information on my file. I am asking for all information regarding claim [claim #]. Confirm why sgi has only sent me back the information I provided to them. I am requesting all information on file for claim [claim #]. Confirm this is understood in writing please.</p>
February 9, 2023	<p>Information is certainly missing. You refer to my file. I am not referring to my file, I am referring to the entire claim, for some reason you choose to ignore this and with-hold information. Why do you ignore this?</p>
February 9, 2023	<p>As stated several times now as well. Information regarding measurements is missing. Information regarding conclusions is entirely missing. Correspondence and communication with opposing party is missing. More items are missing than sgi has provided.</p>

[12] In an email dated February 10, 2023, SGI responded to the Applicant:

All information relating to your entire claim has been sent. Nothing has been with-held. Some of the information has been redacted and the sections the redacted information is with-held under was provided to you in the response letter dated December 8, 2022.

We have sent your photos of your vehicle that include measurements. We took photos and measurements when your vehicle came in, in case we needed the measurements to assist with liability. The other party did not have measurements completed. Based on the information that we have between your claim file and the other party's claim file, you have been found to be liable for the damages caused to the other vehicle. The damages between both vehicles do align there is paint transfer that shows your vehicle would have caused the damages. It is clear In assessing the claims that your door has struck the other party's vehicle. This is how the conclusion has been decided upon.

[13] On August 2, 2023, the Applicant informed SGI that they were filing a case against the other party in Small Claims Court.

[14] On August 4, 2023, SGI mailed out a package to the Applicant with the information required for Small Claims Court.

Access Request 2

[15] On March 26, 2025, the Applicant submitted the following access to information request to SGI:

all forms, policies, procedures & documentation for adjusting, assessing, determining liability clear recovery claims.

[16] On April 17, 2025, SGI responded to the Applicant. SGI provided partial access to records. Its response to the Applicant said:

Your request has been partially granted. Please find attached 4 pages from the Auto Handbook.

Please note that adjusters reference the Automobile Accident Insurance Act when adjudicating claims. This has been withheld under section 3(1) of the Act which states:

3(1)(a) *This Act does not apply to published material or material that is available for purchase by the public*

Access Request 3

- [17] On May 15, 2025, the Applicant submitted the following access to information request to SGI:

Requesting all information, Forms, Policies & Procedures that was used for the adjustment of claim SK [claim number]. Exact information that was specifically used, referenced, etc. Not acceptable to state. “Automobile Accident Ins Act” was used. Exact paragraphs, line, or other specific verbiage used.

The Applicant specified the time period for the sought records to be 2021 – 2025.

- [18] On the same day, SGI responded to the Applicant’s access request:

In March 2025, you made a request for “all forms, policies, procedures & documentation for adjusting, assessing, determining liability clear recovery claim” and this request was also partially granted, SGI file number FOI-25-045-G.

According to the Office of the Information and Privacy Commissioner of Saskatchewan’s Best Practices for Responding to Access Requests [...] “a formal access request under either FOIP or LA FOIP entitles the applicant to copies of documents in their original form.” Further, “there is no responsibility under either Act to create records that do not otherwise exist at the time the access to information request is made.”

All records responsive to your request have been provided to you in FOI-22-085-P and FOI-25-045-G. If the records you are looking for are not contained within those two requests, then the records do not exist. This notice has been provided to you pursuant to clause 7(2)(e) of FOIP.

- [19] On June 5, 2025, the Applicant requested a review by the Office of the Saskatchewan Information and Privacy Commissioner (OIPC) of SGI’s response to Access Request 3.

Access Request 4

- [20] On June 5, 2025, the Applicant submitted a fourth access request:

All information for file claim #[claim number]

- [21] SGI responded to Access Request 4 by letter on July 18, 2025. Accompanying the letter was access to 141 pages of records, partially redacted pursuant to the application of the exemptions in sections 17(1)(a), 17(1)(b)(i) and 29(1) of *FOIP*.
- [22] On December 18, 2025, SGI and the Applicant were notified that OIPC would review the SGI response to Access Request 3.
- [23] On January 8, 2026, the Applicant provided a submission to OIPC.
- [24] On January 22, 2026, SGI provided a submission to OIPC and withheld consent to share the SGI submission with the Applicant.
- [25] On January 30, 2026, the Applicant clarified that they were seeking a review of the SGI response to both Access Request 3 and 4.
- [26] On March 18, 2026, SGI and the Applicant were notified that OIPC would review the SGI response to Access Request 4.
- [27] On March 26, 2026, the Applicant contacted OIPC by telephone and provided oral submissions. OIPC provided an email to the Applicant confirming the Applicant's submissions in writing on the same day.
- [28] On May 14, 2026, SGI provided a submission to OIPC with respect to Access Request 4.

II RECORDS AT ISSUE

- [29] There are no records at issue regarding Access Request 3 because SGI claims no records exist. OIPC will the SGI search efforts in response to Access Request 3.
- [30] SGI provided the Applicant with 141 pages in response to Access Request 4. All but five pages were released to the Applicant in full. Portions of the five pages (pages 2, 33, 37, 85

and 86) were redacted pursuant to an application of the exemptions in sections 17(1)(a), 17(1)(b)(i) and 29(1) of *FOIP*.

[31] OIPC noted that SGI raised sections 17(1)(c) and 18(1)(e) of *FOIP* as additional reasons for refusing the Applicant access to portions of the five pages. Since sections 17(1)(c) and 18(1)(e) of *FOIP* are discretionary exemptions and because SGI did not cite these exemptions in its section 7 decision, then OIPC will not be considering these exemptions in this review.

III DISCUSSION OF THE ISSUES

1. Jurisdiction

[32] SGI is a “government institution” as defined by 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*.⁴ Therefore, OIPC has jurisdiction to conduct this review pursuant to PART VII of *FOIP*.

2. The Search for Records was not Reasonable

[33] OIPC reviews a government institution’s efforts to search for records when the government institution responds to an Applicant’s access request by indicating that records do not exist. The focus of a search review by OIPC is always whether the search conducted was reasonable. A reasonable search is one in which an employee, experienced in the subject matter, expends a reasonable effort to locate records that could be reasonably related to the access request. A reasonable effort is the level of effort you would expect of any fair, sensible person searching in areas where records are likely to be stored.

⁴ [*The Freedom of Information and Protection of Privacy Regulations*](#). RRS, c. F-22.01 Reg 1, as amended (effective April 1, 1992).

- [34] There are two circumstances where a government institution can validly claim the non-existence of a record under *FOIP*. The first circumstance is if a record exists, but it is not the possession or control of the government institution to whom the request was made. If another government institution has a greater interest in the record *and* actual possession or control of the record, then the government institution should transfer the access request in accordance with section 11 of *FOIP*.
- [35] The second circumstance that validates a claim of the non-existence of records is if a reasonable search failed to produce records.
- [36] As noted in the Background of this Report, SGI provided the Applicant with four pages of policies from SGI's *Auto Handbook* and referred the Applicant to *The Automobile Accident Insurance Act*⁵ in response to Access Request 2.
- [37] Access Request 3 was similar to the second, but the Applicant specified that any reference to *The Automobile Accident Insurance Act* was not helpful and not wanted. The entire request is vague at best, but it built off the same information as requested in Access Request 2 and Access Request 1. The Applicant made it very clear from the beginning of the access request process that information with respect to the other party's vehicle was part and parcel of all access requests.
- [38] SGI submitted that it interpreted Access Request 3 as asking for clarification and more detail with respect to the SGI response to Access Request 2 – in terms of the Applicant's matter only. In so doing, SGI interpreted Access Request 2 and 3 very narrowly. Access Requests 1, 2 and 3 built off each other. To focus on the wording used in Access Request 3 alone is not only unfair to the Applicant but evidences an approach to access to information that is offside of best practice in this province.
- [39] SGI explained that the search parameters were broadened under Access Request 3 to include a search of the SGI general insurance system (GIS) database. The GIS database

⁵ [*The Automobile Accident Insurance Act*](#),⁵ R.S.S. 1978 c. A-35.

stores all information regarding insurance claims.⁶ SGI searched the GIS database for responsive records relating to the Applicant only, which included “all information, Forms, Policies & Procedures that was used for the adjustment” of the Applicant’s claim. This search did not yield any new responsive records when it came to the Applicant’s Access Requests.

[40] SGI has indeed provided the Applicant with all the records filed on the GIS database under the Applicant’s claim file. However, as noted in the Background, the Applicant sent several emails to press SGI for records regarding the other party who originally filed the claim against them. As such, we must consider whether SGI met its duty to assist as set out in section 5.1(1) of *FOIP* and how this affects the overall reasonableness of the search conducted in this matter.

The Duty to Assist

[41] On May 4, 2026, OIPC emailed SGI:

If the Applicant had submitted an access request indicating [they were] requesting records on claim file [Applicant claim file #] *and any cross files* associated with claim file [Applicant claim file #], would that have captured records about the other party?

[42] On May 5, 2026, SGI responded:

SGI’s standard operating procedure is to consider the applicant’s claim only when an applicant requests their claim file since that information is clearly their personal information and contains the information needed to understand how SGI handled their claim. If the applicant specifically requests a cross claim file, the cross claim is considered but often is extensively redacted.

[Emphasis added]

⁶ In [Review Report 182-2024](#), OIPC considered whether SGI completed a reasonable search for an applicant’s personal health information on the applicant’s claim file. Since all information on claims is stored on GIS, and SGI conducted a search of GIS for the applicant’s personal health information, OIPC found that SGI conducted a reasonable search for records. See paragraphs [89] to [94].

[43] The duty to assist is set out in section 5.1(1) of *FOIP* which provides:

5.1(1) Subject to this Act and the regulations, a government institution shall respond to a written request for access openly, accurately and completely.

[44] The duty to assist requires that government institutions make reasonable efforts to not only identify and seek out records responsive to an applicant's access request but to explain the steps in the process and seek any necessary clarification on the nature or scope of the request within the legislated timeframe.

[45] The emails by the Applicant to SGI make it crystal clear that the Applicant sought records not only with respect to the Applicant and their claim, but also information about the other party and that vehicle. Such information would be stored on a cross file associated with the Applicant's claim file. At no point did the Applicant specifically ask for access to information with respect to the other party's "cross file" but to expect this terminology from a member of the community is unreasonable. How is the Applicant to have had any knowledge of the records management practices of SGI and its terminology? To have responded *accurately*⁷ to the Applicant's access requests, SGI should have explained what a cross file is and whether one existed with respect to the Applicant's matter. SGI should have asked if the Applicant wanted records from any cross files associated with their claim file, subject to any exemptions that SGI may have to apply.

[46] SGI failed to explain to the Applicant that records about the other party would have existed in a cross file associated with the Applicant's claim file. As such, SGI did not meet its duty to assist the Applicant and this goes to the root of the search for Access Request 3. SGI should conduct a search for records in any cross files associated with the Applicant's claim file and provide the Applicant with access to such records, subject to exemptions set out in *FOIP*, within 30 days of the issuance of this Report.

⁷ In OIPC [Review Report 347-2019](#) at paragraph [20], it was discussed that to respond accurately means to understand every part of an access to information request, and to clarify the nature if required. This includes providing applicants with information on which records the government institution has in its possession or control that may be responsive to an access to information request, and seeking clarification on the scope if required.

3. The Application of Section 17(1)(a) of *FOIP*

[47] SGI applied section 17(1)(a) of *FOIP* to portions of pages 33, 37, 85 and 86 in the records responsive to Access Request 4.

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

Advice from officials

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

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

[49] OIPC uses the following two-part test to determine if a government institution properly applied section 17(1)(a) of *FOIP*:⁸

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

[50] Relevant definitions are as follows:

- “Advice” is guidance offered by one person to another. It can include the analysis of a situation or issue that may require action and the presentation of options for future action, but not the presentation of facts. Advice encompasses material that permits the drawing of inferences with respect to a suggested course of action, but which does not itself make a specific recommendation. It can be an implied recommendation. The “pros” and “cons” of various options also qualify as advice. It should not be given a restricted meaning. Rather, it should be interpreted to include an opinion that involves exercising judgement and skill in weighing the significance of fact. It includes expert opinion on matters of fact on which a government institution must make a decision for future action.

⁸ OIPC [Review Report 114-2025](#) at paragraph [38].

- A “proposal” is something offered for consideration or acceptance.
- A “recommendation” is a specific piece of advice about what to do, especially when given officially; it is a suggestion that someone should choose a particular thing or person that one thinks particularly good or meritorious. Recommendations relate to a suggested course of action more explicitly and pointedly than “advice”.
- “Analyses” (or analysis) is the detailed examination of the elements or structure of something; the process of separating something into its constituent elements.

[51] The Supreme Court of Canada has instructed on “policy options”:⁹

[26] Policy options are lists of alternative courses of action to be accepted or rejected in relation to a decision that is to be made. They would include matters such as the public servant’s identification and consideration of alternative decisions that could be made. In other words, they constitute an evaluative analysis as opposed to objective information.

[27] Records containing policy options can take many forms. They might include the full range of policy options for a given decision, comprising all conceivable alternatives, or may only list a subset of alternatives that in the public servant’s opinion are most worthy of consideration. They can also include the advantages and disadvantages of each option, as do the Records here. But the list can also be less fulsome and still constitute policy options. For example, a public servant may prepare a list of all alternatives and await further instructions from the decision maker for which options should be considered in depth. Or, if the advantages and disadvantages of the policy options are either perceived as being obvious or have already been canvassed orally or in a prior draft, the policy options might appear without any additional explanation. As long as a list sets out alternative courses of action relating to a decision to be made, it will constitute policy options.

[52] SGI submitted that the redacted portions on pages 33, 37, 85 and 86 qualify as recommendations, policy options and analyses.

[53] Our review revealed that the redacted portions of pages 33 and 37 are recommendations by adjusters. On page 33, the adjuster is making a recommendation to the Auto Claims Team on the next step that should be taken if a certain event occurs. On page 37, the adjuster

⁹ [*John Doe v. Ontario \(Finance\)*](#) 2014 SCC 36, [2014] 2 SCR 3 at paragraphs [26] and [27].

recommends an action to be taken by the Auto Claims Team and the reason for the recommendation. The adjusters making the recommendations are employees of SGI (a government institution). Both parts of the two-part test are met. SGI properly applied section 17(1)(a) of *FOIP* to the redacted portions of pages 33 and 37.

[54] However, the redacted portions on pages 85 and 86 do not meet the first part of the two-part test. That is, the redacted portions on pages 85 and 86 do not qualify as advice, proposals, recommendations, analyses or policy options. On page 85, the redacted portion is an adjuster's relaying of the other party's version of the facts. On page 86, the redacted portion is an adjuster's version of the Applicant's interpretation of the facts. The Applicant's adjuster requested information from the other party's adjuster. This does not qualify as advice, proposals, recommendations, analyses or policy options.

[55] SGI did not properly apply section 17(1)(a) of *FOIP* to pages 85 and 86. There will be consideration of whether SGI properly applied section 17(1)(b)(i) of *FOIP* to the redactions on these pages.

4. The Application of Section 17(1)(b)(i) of *FOIP*

[56] Only pages 85 and 86 will be considered in this analysis of section 17(1)(b)(i) of *FOIP*.

[57] Section 17(1)(b)(i) of *FOIP* provides:

Advice from officials

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

...

(b) consultations or deliberations involving:

(i) officers or employees of a government institution;

[58] OIPC uses the following two-part test to determine if section 17(1)(b)(i) of *FOIP* applies:¹⁰

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

[59] In its submission, SGI asserted that the redacted contents on pages 85 and 85 qualified as consultations and deliberations. Relevant definitions are as follows:¹¹

- A “consultation” can occur when the views of one or more officers or employees of a government institution are sought as to the appropriateness of a particular proposal or suggested action. It can include consultations about prospective future actions and outcomes in response to a developing situation. It can also include past courses of action. For example, where an employer is considering what to do with an employee in the future, what has been done in the past can be summarized and would qualify as part of the consultation or deliberation.
- “Deliberation” means the act of deliberating: to deliberate, to weigh in mind, to consider carefully with a view to a decision, to think over. It is the careful consideration with a view to a decision, and the consideration and discussions of the reasons for and against a measure. A deliberation can occur when there is a discussion or consideration of the reasons for or against an action. It can refer to discussions conducted with a view towards making a decision.
- “Involving” means including. There is nothing in the exemption that limits the exemption to participation only of officers or employees of a government institution. Collaboration with others is consistent with the concept of consultation.
- “Employee” means an individual employed by a local authority and includes an individual retained under a contract to perform services for the local authority.
- “Officer” means a high ranking individual within the government institution who exercise management and administrative functions, and who derives their authority from statute.

¹⁰ OIPC [Review Report 241-2024](#) at paragraph [24].

¹¹ OIPC [Review Report 121-2025](#) at paragraph [42] and [43].

[60] In *Tarasoff v Saskatoon (City)*, 2025 SKKB 41, Gerecke J. described “consultations” as information gathering to better inform proposal-development:¹²

[67] I accept that the concept of deliberation might suggest an intent to decide. Consultation appears to be a broader term, and need not have that objective, though the definition advanced by the Commissioner suggests that such an objective might be necessary. Consultation might reasonably occur at such an early stage of decision-making that it equates to information gathering to better inform proposal-development. If the Legislature intended to exclude discussions with persons that might not lead to decisions, it would have been a simple matter to include that notion in s. 16. It did not do so.

[Emphasis added]

[61] OIPC has already described the redacted contents of pages 85 and 86. In its submission, SGI said the two adjustors exchanged information to better understand the situation with a view towards making a decision. Upon review of the redacted contents on pages 85 and 86, the Applicant’ claim adjuster sought information from other adjuster in order to understand the full situation and in order to come to a decision. The withheld information qualifies as consultations and deliberations. Since the consultations/deliberations involves employees of SGI, then the two-part test for section 17(1)(b)(i) of *FOIP* is met. SGI properly applied section 17(1)(b)(i) of *FOIP* to pages 85 and 86.

5. The Application of Section 29(1) of *FOIP*

[62] SGI applied section 29(1) of *FOIP* to portions of pages 2 and 86 of the records responsive to Access Request 4. The redacted content was the other party’s claim file number.

[63] Section 29(1) of *FOIP* provides:

Disclosure of personal information

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

¹² [*Tarasoff v Saskatoon \(City\)*](#), 2025 SKKB 41 at paragraph [67].

[64] Section 29(1) of *FOIP* is a mandatory exemption. Prior to a consideration of section 29(1), the first determination must be whether the information qualifies as “personal information” as defined by section 24(1) of *FOIP*. In order for information to be “personal information”, it must be (1) be about an identifiable individual; and (2) be personal in nature.

[65] Section 24(1)(d) of *FOIP* is relevant in this review:

Interpretation

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:

...
(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*;

[66] A claim file number assigned to an individual qualifies as “personal information”.¹³ The claim file number of the other party in this case qualifies as personal information as defined by section 24(1)(d) of *FOIP*. SGI properly applied section 29(1) of *FOIP* to the portions of pages 2 and 86 that feature the other party’s claim file number.

IV FINDINGS

[67] OIPC has jurisdiction to conduct this review pursuant to PART VII of *FOIP*.

[68] SGI did not conduct a reasonable effort to search for responsive records with regards to Access Request 3.

[69] SGI did not meet the duty to assist the Applicant.

[70] SGI properly applied section 17(1)(a) of *FOIP* to the redacted portions of pages 33 and 37 that are responsive to Access Request 4.

¹³ OIPC [Investigation Report 015-2025](#) at paragraph [28].

[71] SGI properly applied section 17(1)(b)(i) of *FOIP* to pages 85 and 86 that are responsive to Access Request 4.

[72] SGI properly applied section 29(1) of *FOIP* to the portions of pages 2 and 86 that are responsive to Access Request 4 that feature the other party's claim file number.

V RECOMMENDATIONS

[73] I recommend that SGI conduct a search for records in any cross files associated with the Applicant's claim file and provide the Applicant with access to such records, subject to exemptions set out in *FOIP*, within 30 days of the issuance of this Review Report.

[74] I recommend that SGI continue to refuse the Applicant access to the redacted contents on pages 2, 33, 37, 85 and 86 of the pages responsive to Access Request 4.

Dated at Regina, in the Province of Saskatchewan, this 17th day of June, 2026.

Grace Hession David
Saskatchewan Information and Privacy Commissioner