



Office of the  
Saskatchewan Information  
and Privacy Commissioner

## **REVIEW REPORT 286-2023**

### **Ministry of Social Services**

**July 17, 2024**

#### **Summary:**

The Applicant submitted an access to information request to the Ministry of Social Services (Social Services). Social Services withheld portions of the responsive records pursuant to subsections 13(1)(b), 16(1), 17(1)(a), (b), (c), 18(1)(b), (d), 22(a) and 29(1) of *The Freedom of Information and Protection of Privacy Act* (FOIP). The Applicant was not satisfied and requested that the Commissioner undertake a review of the exemptions claimed. The Commissioner also reviewed four sets of records that Social Services had identified as not responsive. For one of these sets of records, the Commissioner found that pursuant to subsection 23(3)(c) of FOIP, the confidentiality provisions found in section 74 of the CFSA prevails and as such, recommended Social Services take no further action regarding these records. In another set of these records, the Commissioner recommend that Social Services ask the Applicant if they want copies of duplicate records, and then provide them within 30 days of the issuance of this Report subject to any exemptions found to apply. For the records Social Services identified as responsive to the Applicant's request, the Commissioner reviewed the application of various exemptions. The Commissioner found that Social Services made a *prima facie* case that subsection 22(a) of FOIP applies with some exceptions. The Commissioner also found that subsections 13(1)(b), 16(1), 17(1)(a), 17(1)(b), (c), 22(a) and 29(1) of FOIP were properly applied to some portions of the records, but not to others. The Commissioner recommended that Social Services continue to withhold or to release records within 30 days of the issuance of the Report, as outlined in the Appendix.

## I BACKGROUND

[1] On February 23, 2023, the Ministry of Social Services (Social Services) received the Applicant's access to information for the following records for the time period of January 1, 2000 to October 1, 2019:

All documentation (policies, protocols, guidelines, reports, and emails) related to the practice of "birth alerts" or "hospital alerts". Description of a birth alert: a practice wherein social workers issued notifications to a hospital regarding an expectant parent where the social worker believed that, following delivery, the child may require protection.

[2] On February 28 and March 2, 2023, Social Services worked with the Applicant to clarify the scope of the access request.

[3] On March 23, 2023, Social Services sent a letter to the Applicant advising that the request involved a large number of records; therefore, it issued a \$895.00 fee estimate. Social Services requested a deposit of \$447.50 to proceed with processing the Applicant's request, which the Applicant paid April 4, 2023.

[4] In correspondence dated April 28, 2023, Social Services advised the Applicant that it was applying a 30-day extension for its response to the Applicant's request pursuant to subsections 12(1)(a)(i) and 12(1)(b) of *The Freedom of Information and Protection of Privacy Act* (FOIP).

[5] On June 16, 2023, the Applicant paid the remainder of the fee owing to Social Services.

[6] On July 4, 2023, Social Services issued its section 7 decision letter to the Applicant stating:

Some of the records you are requesting may be publicly available.

- The Children's Services Manual...
- The Child Protection Manual...
- In part 3 of the records, 431 pages were removed as they can be found publicly here...

...

Please find attached records responsive to your request. Please note that, pursuant to section 8 of *The Freedom of Information and Protection of Privacy Act* (FOIP), some of the information contained in the attached records has been severed. Access to this information is denied pursuant to sections 13(1)(b); 16(1); 17(1)(a), (b), (c); 18(1)(b), (d); 22(a); and 29(1).

- [7] On October 25, 2023, the Applicant submitted a request for review of Social Services' decision to withhold portions of the responsive record.
- [8] On December 5, 2023, Social Services clarified that the specific clause of subsections 16(1) and 17(1)(b) of FOIP being applied to the records are subsections 16(1)(a) and 17(1)(1)(b)(i) of FOIP to the record.
- [9] On December 6, 2023, my office notified the Applicant and Social Services that my office would be undertaking a review.
- [10] In correspondence dated January 12, 2024, Social Services advised the Applicant that in preparing its submission for my office, it discovered that records it had deemed as duplicates and non-responsive to the Applicant's request were found to be responsive. It released portions of these records to the Applicant, subject to exemptions.
- [11] On February 5, 2024, the Applicant provided a submission. On February 9, 2024, Social Services provided an affidavit for the records it was claiming containing information related to *The Child and Family Services Act* (CFSA). On February 29, 2024, Social Services provided its submission and the affidavit and schedule of records where it was making a *prima facie* case of solicitor-client privilege.

## **II RECORDS AT ISSUE**

- [12] Social Services' index of records for the responsive record, some of which were withheld in part and others withheld in full, is split into five parts totaling 1,379 pages of responsive records as follows:

- Part 1: 287 pages of records,
- Part 2: 692 pages of records,
- Part 3: 212 pages of records,
- Part 4: 177 pages of records, and
- Part 5 (additional partial release of records): 11 pages of records.

[13] Social Services stated that where it is making a *prima facie* case that subsection 22(a) of FOIP applies, it felt it provided sufficient information to also consider subsections 22(b) and (c) of FOIP on those same portions. However, Social Services had not relied on either of these exemptions in its section 7 decision, and our office only considers a *prima facie* case for solicitor-client privilege on records withheld under subsection 22(a) of FOIP. As such, I will not consider subsections 22(b) or (c) of FOIP.

[14] Additionally, Social Services indicated that it missed applying subsection 22(a) of FOIP to the subject line and the name of attachment in record 100, subject lines of record 139, and the subject line and body of the email of record 218. Unless it is a mandatory exemption or unless there are exceptional circumstances, my office does not consider the application of additional exemptions. As Social Services had not originally applied subsection 22(a) of FOIP to these records and this is not a mandatory exemption, I will not consider the application of subsection 22(a) of FOIP to these records.

[15] On January 11, 2024, Social Services provided my office with an index of records that identified four sets of records that it deemed as non-responsive. Social Services also provided my office with copies of records for three of those sets (Set 2: duplicate records, Set 3: publicly available and Set 4: outside of the timeframe). For the first set of non-responsive records, Social Services indicated that the records were subject to the confidentiality requirements in subsection 74(1) of the CFSA; therefore, would not provide copies for my office's review. Social Services provided my office with an affidavit instead.

[16] The Appendix at the end of this Report provides additional details about the records at issue, including my findings and recommendations.

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

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

[17] Social Services is a “government institution” pursuant to subsection 2(1)(d)(i) of FOIP. Therefore, I have jurisdiction to conduct this review.

#### **2. Do some of the records identified contain information that is not responsive to the access to information request?**

[18] As indicated earlier, Social Services also identified four sets of records as non-responsive as follows:

- Set 1 (CFSA): 97 pages
- Set 2 (duplicate records): 253 pages
- Set 3 (publicly available): 937 pages
- Set 4 (outside of timeframe): 41 pages

[19] Page 12 of the *Guide to FOIP*, Chapter 3, “Access to Records,” (*Guide to FOIP*, Ch. 3) provides that when a government institution receives an access to information request, it must determine what information is responsive to the request. “Responsive” means relevant. The term describes anything that is reasonably related to the request. The Applicant’s access to information request itself sets out the boundaries of relevancy and circumscribes the records or information that will be identified as being responsive.

[20] The *Guide to FOIP*, Ch. 3 at page 13, indicates that a public body can sever information as non-responsive only if the Applicant has requested specific information, such as their personal information. The public body may treat portions of a record as non-responsive if

they are clearly separate and distinct and not reasonably related to the access request. The purpose of FOIP is best served when a government institution adopts a liberal interpretation of a request. If a government institution has any doubts about its interpretation, it has a duty to assist an applicant by clarifying or reformulating the request.

[21] I will address each set of records separately.

*Set 1: CFSA*

[22] Set 1 of the records that Social Services identified as non-responsive are 97 pages of records that are client related and pertain to involvement with the Child and Family Programs.

[23] Regarding the records Social Service has asserted subsection 74(1) of the CFSA prevails, it provided an affidavit signed by the Executive Director of Child and Family Programs which states:

2. On behalf of the Ministry of Social Services, I have undertaken a review of the records under review in IPC 286 which were deemed non-responsive to the request as the contents are client specific case planning and I assert that section 74 of *The Child and Family Services Act* applies fully to those records.

[24] For Set 1 of the records identified as non-responsive, Social Services has taken the position that the 97 pages of records are subject to the confidentiality provisions found in section 74 of the CFSA, and that section 74 of the CFSA prevails over FOIP pursuant to subsection 23(3)(c) of FOIP. Social Services also noted in its submission that records 127 to 130, 227 and 255 should have been redacted under subsection 74(1) of the CFSA. Social Services had initially withheld records 127 to 130 pursuant to subsection 16(1) of FOIP and records 227 and 255 pursuant to subsection 29(1) of FOIP.

[25] Subsection 23(1) of FOIP provides:

**23(1)** Where a provision of:

(a) any other Act; or

(b) a regulation made pursuant to any other Act;

that restricts or prohibits access by any person to a record or information in the possession or under the control of a government institution conflicts with this Act or the regulations made pursuant to it, the provisions of this Act and the regulations made pursuant to it shall prevail.

[26] The *Guide to FOIP*, Chapter 1, “Purposes and Scope of FOIP,” at page 27, provides the following definition:

- “Primacy clauses” are clauses in a statute that define how a statute is interpreted if its provisions are inconsistent with another statute in the same jurisdiction. Primacy means the state or position of being first in order, importance, or authority.

[27] Page 27 of the *Guide to FOIP*, Ch. 1, explains that if engaging subsections 23(1), (2) or (3) of FOIP, the government institution should be able to demonstrate that the record or information in question falls within the statutory provision that is not subject to FOIP. It should be noted that section 23 of FOIP only applies to portions of Parts II and III of FOIP, which refer to access to records. All the other provisions of FOIP would fully apply such as the protection of privacy provisions in Part IV and the review and appeal provisions in Part VII.

[28] Page 27 of the *Guide to FOIP*, Ch. 1, further explains that subsection 23(3) of FOIP provides a list of provisions where FOIP does not prevail. Additional provisions that FOIP does not prevail over are also prescribed in section 12 of *The Freedom of Information and Protection of Privacy Regulations* (FOIP Regulations).

[29] Subsection 23(3)(c) of FOIP states:

**23(3)** Subsection (1) does not apply to:

...

(c) section 74 of *The Child and Family Services Act*;

[30] In my office's [Review Report 269-2023](#), I continued an approach wherein I acknowledged the relationship between subsection 23(3)(c) of FOIP and section 74 of the CFSA. Because subsection 23(3) of FOIP lists section 74 of the CFSA as the prevailing provision when there is conflict between FOIP and another Act (in this case the CFSA), then section 74 of the CFSA would prevail.

[31] Based on Social Services' affidavit and explanation, I find in this matter that pursuant to subsection 23(3)(c) of FOIP, the confidentiality provisions found in section 74 of the CFSA prevail and apply to the identified records. If records are non-responsive, I normally recommend that a public body release them subject to any exemptions found to apply (see [What About the Non-Responsive Record?](#)). Since I find that the CFSA applies, I recommend Social Services take no further action regarding these records.

***Set 2: Duplicate records***

[32] Set 2 of the records that Social Services identified as non-responsive include 253 pages of duplicate records. In the index of records for these records, Social Services identified where these duplicate records could be found in the five parts of responsive records.

[33] Pages 30 and 31 of the *Guide to FOIP*, Ch. 3, provides that if a government institution is going to leave duplicate attachments out of a record, or re-order the record, it is best practice to provide an explanation to the applicant when it provides the record.

[34] Pages 30 and 32 of the *Guide to FOIP*, Ch. 3, provides the following regarding a government institution's obligation to respond completely to an access request:

Subsection 5.1(1) of FOIP requires a government institution to respond to an applicant's written access to information request openly, accurately and completely...

...

"Complete" means having all its parts; entire; including every item or element; without omissions or deficiencies; not lacking in any element or particular. Furthermore, it means the information from a government institution must be comprehensive and not leave any gaps in its response to an applicant's access to information request. A



government institution should provide all the necessary details to enable an applicant to understand how a decision was reached...

[35] Based on a review of the correspondence provided to my office, it does not appear that Social Services advised the Applicant it was not providing duplicate copies of records responsive to this request. Doing so is part of the duty to assist. As such, in the future Social Services should ensure it communicates with applicants its decision to leave out duplicate records so that it is responding completely. In this matter, I recommend that Social Services ask the Applicant if they want copies of Set 2 of the non-responsive duplicate records, and if they do, then provide them within 30 days of the issuance of this Report subject to any exemptions found to apply.

***Set 3: Publicly available***

[36] Set 3 of the records that Social Services also identified as non-responsive include 937 pages of records as non-responsive as they are publicly available. Social Services' section 7 decision letter to the Applicant identified that some of the responsive records were publicly available and included links to access those records. Subsection 7(2)(b) of FOIP provides that if a requested record is published, that the government institution is required to refer the Applicant to the publication as follows:

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

...

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

[37] Based on Social Services section 7 decision letter, it appears that Social Services had identified these records as responsive to the Applicant's request; however, Social Services did not properly reference subsection 7(2)(b) of FOIP for those materials that are published. In the future, I recommend that Social Services should make reference to subsection 7(2)(b) of FOIP when some of the requested records are published and it is referring an applicant to those publications.

*Set 4: Outside of Timeframe*

[38] Finally, Set 4 of the records that Social Services identified as non-responsive are 41 pages of records that it identified as being outside of the timeframe of the Applicant's access to information request. While Social Services is not required to search for records outside a given timeframe, it apparently did so in this matter. As the records appear to relate to the topic the Applicant is interested in, Social Services may want to consider releasing these pages to the Applicant, subject to exemptions found to apply.

**3. Did Social Services establish a *prima facie* case that subsection 22(a) of FOIP applies to the records withheld in full and in part?**

[39] Social Services applied subsection 22(a) of FOIP to withhold the following records in full and in part: 3, 4, 16, 18, 21, 100, 101, 139, 184, 185, 191, 195, 198, 207, 208, 221, 222, 224, 225, 251, 252, 253, 322 and 323. Social Services also applied subsection 22(a) of FOIP to record 192 but indicated in its submission that it is no longer claiming subsection 22(a) of FOIP for this record. As such, I will not consider the application of the exemption to record 192.

[40] To establish a *prima facie* case that subsection 22(a) of FOIP applies, Social Services provided my office with an affidavit along with a schedule of records.

[41] Subsection 22(a) of FOIP provides:

**22** A head may refuse to give access to a record that:

(a) contains any information that is subject to any privilege that is available at law, including solicitor-client privilege;

[42] The *Guide to FOIP*, Chapter 4, "Exemptions from the Right of Access" (*Guide to FOIP*, Ch. 4) at page 260, provides that subsection 22(a) of FOIP is a discretionary, class-based exemption. It permits refusal of access in situations where a record contains information that is subject to any legal privilege, including solicitor-client privilege.

[43] Pages 263 to 269 of the *Guide to FOIP*, Ch. 4, provide that the purpose of solicitor-client privilege is to assure clients of confidentiality and enable them to speak honestly and candidly with their legal representatives. The following three-part test can be applied:

1. Is the record a communication between solicitor and client?
2. Does the communication entail the seeking or giving of legal advice?
3. Did the parties intend the communication to be treated confidentially?

[44] I will consider each part of the test.

***1. Is the record a communication between solicitor and client?***

[45] The *Guide to FOIP*, Ch. 4 at pages 263 and 264, provides the following definitions:

- A “Communication” is the process of bringing an idea to another’s perception; the message or ideas so expressed or exchanged; the interchange of messages or ideas by speech, writing, gestures or conduct.
- “Solicitor” means a lawyer who is duly admitted as a member and whose right to practice is not suspended. “Lawyer” means a member of the Law Society and includes a law student registered in the Society’s pre-call training program.
- “Client” means a person who:
  - Consults a lawyer and on whose behalf the lawyer renders or agrees to render legal services; or
  - Having consulted the lawyer, reasonably concludes that the lawyer has agreed to render legal services on his or her behalf;

and includes a client of the law firm of which the lawyer is a partner or associate, whether or not the lawyer handles the client’s work.

This provision ensures that a government institution, as the client, has the same protection for its legal documents as persons in the private sector.

[46] The *Guide to FOIP*, Ch. 4 at page 265, provides that privilege does not necessarily apply to attachments to documents (e.g., attachments to emails), even those attached to genuine legal advice. On the other hand, an attachment that is an integral part of a legal opinion in

the covering email or document could be privileged. For example, if the attachment would provide some basis for a reader to determine some or all of the opinion or advice. The party claiming privilege over an attachment must provide some basis for the claim. The point is that it is the content of the communication and who is communicating, not the form of the communication that determines privilege and confidentiality. Furthermore, it makes no practical sense to pare the contents of attachments in order to sever the parts that are privileged from the parts that are not. If some of the attachment is part of the legal advice, then all of it is protected by solicitor-client privilege.

[47] Social Services listed the Senior Crown Counsel and Crown Counsel lawyers, who are members of the Law Society of Saskatchewan, that were involved in the communications in these records. Therefore, there are solicitors or legal counsel involved.

[48] In its submission to my office, Social Services provided the following:

**The Ministry of Justice an Attorney General has the responsibility to ensure that the administration of public affairs is in accordance with the law. It is also responsible to provide legal advice to ministries and for regulating and conducting all litigation for or against the Crown or any ministry.** Clause 9(1)(b) and (e) of *The Justice and Attorney General Act* state:

9(1) The minister shall:

...

(b) see that the administration of public affairs is in accordance with the law;

...

(e) advise the heads of the several ministries of the government upon all matters of law connected with those ministries;

[Name of Senior Crown Counsel A], [Name of Senior Crown Counsel B], [Name of Senior Crown Counsel C] and [Name of Senior Crown Counsel D] were Senior Crown Counsel and [Name of Crown Counsel] was a Crown Counsel in the Legal Services Division of the Ministry of Justice and Attorney General. The Legal Services Division is made up of the former Civil Law and Public Law Divisions. The Legal Services Division of the Ministry of Justice and Attorney General provides legal services to government ministries. **The Division acts in the same fashion as a private law firm does with a private client. The lawyers provide the full spectrum of legal services to ministries, including the provision of legal advice and litigation.** One of [Name of Senior Crown Counsel A's] clients was the Ministry of Social Services. [Name of

Crown Counsel] was [Name of Senior Crown Counsel A's] back up when she was away from the office due to vacation or sickness. [Name of Senior Crown Counsel B] has two roles as it relates to legal advice she provided in these records. One is with respect to privacy and the other is in relation to her role as one of the several lawyers assigned to the Missing and Murdered Indigenous Women and Girls Inquiry (MMIWGI). The subject of the access request, birth alerts, was one of the subjects explored in the MMIWGI. [Name of Senior Crown Counsel D] was the Director of Litigation.

[Emphasis added]

- [49] In terms of the records under consideration in this section of the Report, Social Services is the client and legal counsel from the Civil Law Branch of the Ministry of Justice and Attorney General is its legal counsel.
- [50] Records 3, 16, 184, 195, 221, 222, 251, 252, 253, 322 and 323 are emails where legal counsel is providing, seeking or discussing legal advice with respect to a certain issue. Based on the information provided by Social Services, I am satisfied that records 3, 16, 184, 195, 221, 222, 251, 252, 253, 322 and 323, are communications between client and solicitor and meet the first part of the test. I will consider the remaining parts of the test on these records.
- [51] Records 18, 101, 185, 208 and 225 are attachments to emails over which Social Services is claiming solicitor-client privilege. Social Services stated that the records are a memorandum containing legal advice or are documents attached to an email that Social Services is seeking legal advice on. Based on what I have reviewed, I am satisfied that records 18, 101, 185, 208 and 225 were authored by legal counsel for Social Services and would meet the first part of the test. I will consider the remaining parts of the tests on these records.
- [52] Based on the information provided by Social Services, however, I cannot determine that records 4, 21, 100, 139, 191, 198, 207 and 224 contain communications between Social Services and one of its legal counsel. As such, the first part of the test is not met for these records and there is no need to consider parts two and three of the test for them. I find,

therefore, that Social Services has not made a *prima facie* case that subsection 22(a) of FOIP applies to records 4, 21, 100, 139, 191, 198, 207 and 224.

[53] As stated earlier in this Report, Social Services' submissions to my office also stated that subsection 22(b) and (c) of FOIP would apply to records 18, 100, 195, 208, 221, 222, 225, 251 to 253, 322 and 323. However, I note that Social Services did not reference subsections 22(b) and (c) of FOIP in its section 7 decision. As such, I cannot find that these exemptions apply to these portions of the records. Further, Social Services' index of records lists subsections 17(1)(a), (b) and 16(1) of FOIP for record 139 and subsections 17(1)(a) and (b) for these portions of records 21, 191, 192, 198, 207 and 224. As Social Services was making a *prima facie* case that subsection 22(a) of FOIP applies to these pages, it did not provide copies of these portions of the records to my office to review. My office asked Social Services about its position, and it reconfirmed with my office that it did not intend to provide the records so my office could consider these additional exemptions. As such, I cannot find that subsections 17(1)(a), (b) and 16(1) of FOIP apply to these portions of the records. I recommend, therefore, that Social Services release these portions of records 4, 21, 100, 139, 185, 191, 192, 198, 207 and 224 to the Applicant within 30 days of the issuance of this Report. See Appendix for details. I will consider parts 2 and 3 of the test on the remaining records.

**2. Does the communication entail the seeking or giving of legal advice?**

[54] The *Guide to FOIP*, Ch. 4 at page 235, provides that "legal advice" means a legal opinion about a legal issue, and a recommended course of action, based on legal considerations, regarding a matter with legal implications.

[55] Social Services' affidavit asserts that the communications at issue relate to the seeking or obtaining of legal advice. Social Services also provided a letter that provides a brief description for each of the records and indicated as follows:

All the records responsive to the access request capture legal advice provided, sought or discussed with respect to a certain issue (birth alerts). The records include legal opinions provided by various lawyers, internal ministry discussions sharing or asking

follow up questions to their lawyers and the lawyers providing response to those questions or advising that the answers would be forthcoming. In sum, the information withheld was shared in the context of a solicitor client relationship.

[56] In addition, in my [Review Report 188-2022](#), I noted that, “I am not satisfied that the headers, footers, subject lines and confidentiality statements in the emails at issue would contain communications (or the substance of communications) where legal advice was sought or given.” As such, these portions of the records would not meet the second part of the test and I will not consider the third part of the test to this information. I recommend, therefore, that Social Services release the headers, footers, subject lines and confidentiality statements to the Applicant within 30 days of the issuance of this Report.

[57] Based on a review of the details provided by Social Services, I am satisfied that the second part of the test is met for the remaining portions of the records.

***3. Did the parties intend the communications to be treated confidentially?***

[58] Pages 267 and 268 of the *Guide to FOIP*, Ch. 4, provides that there must be an expectation on the part of the government institution that the communication will be confidential. “Not every aspect of relations between a lawyer and a client is necessarily confidential.” Conduct which is inconsistent with an expectation of confidentiality can constitute a waiver of privilege. Confidentiality is the *sine qua non* of privilege. Without confidentiality there can be no privilege and when confidentiality ends so too should the privilege. As a general rule, the client (usually a government institution) must not have disclosed the legal advice (either verbally or in writing) to parties who are outside of the solicitor-client relationship.

[59] In its affidavit, Social Services submitted that the records were intended to be kept confidential and have been consistently treated as confidential. Given the details provided by Social Services regarding the nature of the records, it appears that the parties intended for the emails to be treated confidentially. As the third part of the test is met for the remaining portions of the records, I find that Social Services has made a *prima facie* case that subsection 22(a) of FOIP applies to records 3, 16, 18, 101, 184, 185, 195, 208, 221,

222, 225, 251, 252, 253, 322 and 323, with the exception of any headers, footers, subject lines and confidentiality statements that were withheld. I recommend Social Services continue to withhold these portions of the record except for the portions noted above. See the Appendix for details.

**4. Did Social Services properly apply subsection 13(1)(b) of FOIP?**

[60] Social Services applied subsections 13(1)(b) of FOIP to portions of records 9, 17, 19, 24, 27 to 30, 35, 39, 100, 102, 163, 164 and 307. Social Services advised that it is no longer applying subsection 13(1)(b) of FOIP to record 59, as such I will not consider the application of this exemption to this record. Social Services however applied subsections 17(1)(a) and (b) of FOIP to record 59, so I will consider the application of those exemptions to this record later in the Report.

[61] Subsection 13(1)(b) of FOIP provides:

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

...

(b) the government of another province or territory of Canada, or its agencies, Crown corporations or other institutions;

unless the government or institution from which the information was obtained consents to the disclosure or makes the information public.

[62] Pages 21 and 22 of the *Guide to FOIP*, Ch. 4, provides that subsection 13(1)(b) of FOIP is a mandatory class-based exemption. It permits refusal of access to information in a record where the information was obtained in confidence, implicitly or explicitly, from another provincial or territorial government in Canada unless there is consent to release or the information was made public. It includes the province or territory's agencies, Crown corporations and other institutions.

[63] Pages 22 to 26 of the *Guide to FOIP*, Ch. 4, provides that the following three-part test can be applied:



1. Was the information obtained from the government of another province or territory of Canada, or its agencies, Crown corporations or other institutions?
2. Was the information obtained implicitly or explicitly in confidence?
3. Is there consent to disclose the information or has the information been made public?

[64] Social Services' submission provides as follows:

The first part of the test is met for all the records mentioned above as the information was obtained from other provinces of Canada. Information was obtained from direct exchanges with the bodies in writing as well as through summaries of meetings or verbal discussion with the provinces. These direct exchanges were either completed by senior leadership at the DCW [Directors of Child Welfare] table or by MSS staff speaking with their counterparts in other provinces. table. The DCW is a community of practice where senior officials from all provinces and territories are able to confidentially discuss proposed changes to policies, and exchange information that may be beneficial for other provinces facing similar challenges.

The second part of the test is met because the information is shared at the DCW with an implied understanding of confidentiality. Confidentiality is understood because the discussion encompasses information that is not publicly known and not usually shared. It is due this this implied confidentiality that the DCW table is able to discuss emerging issues and express their views, ideas and potential policy changes freely. It is done so in this forum to promote relationships and build from lessons learned in other jurisdictions.

...

The Ministry has not sought the consent of the involved jurisdictions nor has the information been made public.

- 1. Was the information obtained from the government of another province or territory of Canada, or its agencies, Crown corporations or other institutions?***

[65] Pages 22 to 25 of the *Guide to FOIP*, Ch. 4, provides the following definitions:

- “Obtained” means to acquire in any way; to get possession of; to procure; or to get a hold of by effort.

...

- “Information” means facts or knowledge provided or learned as a result of research or study.

...

- “In confidence” usually describes a situation of mutual trust in which private matters are relayed or reported. Information obtained *in confidence* means that the provider of the information has stipulated how the information can be disseminated. In order for confidence to be found, there must be an implicit or explicit agreement or understanding of confidentiality on the part of both the government institution and the party that provided the information.

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...

Once it has been established that the executive branch of government obtained a record from another government in confidence, the continued confidentiality of that record must be presumed, unless the other government has consented to disclosure or has made the information public. In other words, there are no time limits on the confidentiality. Just because a record might be old, it does not lose its confidential nature.

- “Implicitly” means that the confidentiality is understood even though there is no actual statement of confidentiality, agreement or other physical evidence of the understanding that the information will be kept confidential.

[66] The *Guide to FOIP*, Ch. 4 at page 22, notes that a government institution could obtain information either intentionally or unintentionally. It can also include information that was received indirectly provided its original source was the government of another province or territory of Canada. However, to obtain information suggests that the government institution did not create it. Regardless, the provision is not so much driven by the source of the record to which access is sought as it is by the confidential nature and source of the information it contains. As such, authorship (or who created the record) is irrelevant.

[67] Section 13 of FOIP uses the term “information contained in a record” rather than “a record” like other exemptions. Therefore, the exemption can include information within a record that was authored by the government institution provided the information at issue was obtained from the government of another province or territory of Canada.

[68] The portions of record 19 where subsection 13(1)(b) of FOIP was applied is an email from a government employee from of the Government of British Columbia about changes to its policy. The portions of records 9 and 27 where Social Services applied subsection 13(1)(b)

of FOIP is an appendix to a briefing note discussing options for Saskatchewan and discussing practices of other provinces. The appendix summarizes the practices of each province from British Columbia, Alberta, Manitoba, Ontario, Quebec, New Brunswick, Prince Edward Island, Nova Scotia, Newfoundland & Labrador, Yukon, Northwest Territories and Nunavut. Record 29 consists of notes detailing consultations with other provinces regarding their experiences. The prepared summary relates to consultations with Alberta, British Columbia and Manitoba. Records 17 and 30 are tables outlining details from other provinces regarding its policies. This table relates to policies implemented in Alberta, British Columbia and Manitoba. Record 164 is a presentation containing data from the Ministry of Children and Family Development with the Government of British Columbia. Records 24, 100, 102 and 307 are emails that contain information related to policies in Ontario, Manitoba, British Columbia, Alberta and Yukon. It appears these emails contain information that Social Services had obtained in telephone conversations with the DCW group, that Social Services obtained this information from the governments of other provinces, which meets the first part of the test.

[69] Records 28, 35, 39 and 163 are emails that identify the topic of discussion but do not include details of information that Social Services obtained from another province. A portion of record 307 outlines questions to be posed to gain details about policies in other provinces but does not provide any details regarding information obtained from another province. Therefore, the first part of test is not met, and I have no need to consider the second and third parts of the test. I find that Social Services has not properly applied subsection 13(1)(b) of FOIP to these records. See Appendix for details. Social Services also applied subsections 17(1)(a) and (b) of FOIP to these portions of records 28, 35, 39, 163 and 307. I will consider the application of these exemptions later in the Report.

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

***3. Is there consent to disclose the information or has the information been made public?***

[70] Records 9, 24, 27, 100 and 102 are emails that contain information related to the policies of other provinces. I am not persuaded that Social Services obtained the information in

confidence as since the policies relate to a practice that has been undertaken by other provinces, this suggests that knowledge of the practice is available to the public. Social Services indicated it had “not sought the consent of the involved jurisdictions nor has the information been made public”. However, there appears to be some instances where policies or statements from other provinces appear to be publicly available, such as on websites. As such, I find that Social Services has not properly applied subsection 13(1)(b) of FOIP to these records.

[71] As Social Services has applied other exemptions to records 9, 27, 100 and 102, I will consider the application of those exemption later in this Report. I recommend, that Social Services release record 24 within 30 days of the issuance of this Report. See Appendix for details.

[72] For records 17, 19, 29, 30 and 164, Social Services’ submission provides that the information was provided implicitly in confidence. Social Services noted that the DCW group discusses emerging issues with an understanding that these matters are not publicly known and would not normally be shared. Social Services also indicated in its submission that it had “not sought the consent of the involved jurisdictions.” As such, I find that Social Services has properly applied subsection 13(1)(b) of FOIP to these records. I recommend that Social Services continue to withhold records 17, 19, 29, 30 and 164. See the Appendix for details.

[73] Social Services applied other exemptions to the same portions of records 19 and 29, but as I have found that Social Services properly applied subsection 13(1)(b) of FOIP to these records, there is no need to consider the application of any other exemptions.

## **5. Did Social Services properly apply subsection 17(1)(a) of FOIP?**

[74] Social Services applied subsection 17(1)(a) of FOIP in full or in part to records 2, 5 to 13, 21, 22, 26 to 29, 31 to 36, 39, 40, 43, 44, 49 to 56, 59 to 65, 67 to 69, 72 to 77, 79, 81, 85, 86, 90 to 100, 102, 104 to 109, 111 to 120, 122 to 152, 154 to 156, 159 to 163, 166 to 183,

186 to 191, 193, 194, 196 to 200, 202, 203, 205, 206, 209 to 218, 223, 226 to 231, 234, 236 to 243, 245, 247 to 254, 256 to 259, 261 to 267, 269 to 271, 277, 278, 280, 286 to 298, 300 to 321, 324 and 325. However, as I have already found Social Services properly applied subsection 13(1)(b) of FOIP to record 29, there is no need to consider the application of subsection 17(1)(a) of FOIP.

[75] Subsection 17(1)(a) 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:

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

[76] Page 128 of the *Guide to FOIP*, Ch. 4, provides that subsection 17(1)(a) of FOIP is a discretionary class-based exemption. It permits refusal of access in situations where release 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.

[77] The *Guide to FOIP*, Ch. 4 at pages 128 to 131, provides that the following two-part test can be applied for the application of subsection 17(1)(a) of FOIP:

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?

[78] Social Services' submission notes that the records it applied subsection 17(1)(a) of FOIP to contain advice, analyses, proposals and policy options. Based on this Social Services appears to be taking the position that the first part of the test would be met.

[79] The *Guide to FOIP*, Ch. 4, pages 128 to 133 provide the following definitions:

- “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.

Advice includes the views or opinions of a public servant as to the range of policy options to be considered by the decision maker even if they do not include a specific recommendation on which option to take.

Advice has a broader meaning than recommendations. The legislative intention was for advice to have a distinct meaning from recommendations. Otherwise, it would be redundant. While “recommendation” is an express suggestion, “advice” is simply an implied recommendation.

- A “proposal” is something offered for consideration or acceptance.
- “Analyses” (or analysis) is the detailed examination of the elements or structure of something; the process of separating something into its constituent elements.
- “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.

...

Factual material means a cohesive body of facts, which are distinct from advice, proposals, recommendations, analyses and/or policy options. A government institution can only withhold factual material or assertions of fact under subsection 17(1) of FOIP if the factual information is sufficiently interwoven with other advice, proposals, recommendations, analyses and/or policy options so that it cannot reasonably be considered separate and distinct. In other words, where factual information is intertwined with advice or recommendations in a manner whereby no reasonable separation can be made, then the information is not factual material and can be withheld.

[80] In this part of the review, I am dealing with some draft documents. My office’s [Review Report 100-2018](#), discussed the application of *The Local Authority Freedom of Information*

*and Protection of Privacy Act* (LA FOIP) equivalent provision, subsection 16(1)(a) of LA FOIP to draft version of a letter as follows:

[36] Records 004 and 005 also contain attachments of draft versions of the final version of the letter released to the Applicant (Record 002).

[37] The Office of the Information and Privacy Commissioner for British Columbia (BC IPC) in its [Order F 15-33](#) involving the City of Vancouver stated, “the applicant is a former City employee seeking information relating to disciplinary actions taken against him by the City and the City’s response to grievances filed on behalf of the applicant by his Union.” In this Order, the BC IPC considered their equivalent of Saskatchewan’s subsection 16(1)(a) of LA FOIP:

[19] The City submits that the emails and draft letters it is withholding under s. 13 contain advice and recommendations passed between City employees relating to the disciplinary and grievance actions taken involving the applicant...

...

[23] Some of the withheld information comprises draft letters attached to an email, where the email author is seeking comment on the draft from fellow employees. In one case the author of the draft is the decision maker, as his name appears as the author of the letter. In this context, the request and the draft letter do not contain advice or recommendations because the decision maker is requesting advice or recommendations, not providing the draft letter as advice or recommendations. However, despite this, disclosing the draft letter would enable it to be compared with the final version of the letter that was disclosed to the applicant. This would enable the applicant to draw accurate inferences about advice or recommendations based on changes to the letters from the draft to the final version. Therefore s. 13(1) applies to this information.

...

[38] I agree with the BC IPC interpretation that drafts of a letter would enable the Applicant to draw accurate inferences about the advice and recommendations based on changes to the letters from draft to the final version.

[39] This advice was developed by the SHA for the purpose of addressing concerns with the employee’s suitability for their position.

[40] As such, I find that both parts of the test have been met.

[81] Regarding drafts in this matter, I note that Social Services has released the final version of these documents to the Applicant. Based on a review of the records, the documents themselves do not appear to contain advice or recommendations. However, I will need to consider if the draft version of the documents were released to the Applicant, if this would

enable the Applicant to draw inferences about advice or recommendations based on changes to the documents from the draft to the final version.

- Records 2 and 49 - withheld in full, are draft versions of a letter. The final version of this letter was released to the Applicant in record 299, with the exception of information that Social Services withheld as personal information of another individual. Social Services described the draft letters as “containing advice on how the Minister should respond to a member of the public”.
- Records 64, 123, 125, 132, 134, 137, 141, 143, 197, 230, 237, 243 and 257 - appear to be drafts of a flow chart. Social Services indicated that these records are a “draft flow chart of internal practices proposed.” The final version was released to the Applicant in record 82.
- Records 97 and 206 - are drafts of a media briefing. The final version was released to the Applicant in record 83. Social Services described the draft media briefings as “opinions from Communications regarding media updates.”
- Records 52 and 289 - are drafts of an invitational letter for a workshop. The final version was released to the Applicant in record 80. Regarding the drafts, Social Services stated that “the intent of this record is seeking feedback and approval on [sic] draft letter.”
- Record 287 - contains drafts of a portion of the Child Protection Services Manual. The final version was released in records 73 to 75. Social Services indicated that the draft “contains advice and proposals. The record shows documentation of draft policy changes.”

[82] From a review of the records at issue, it appears the records are being shared so that others may review the records, but it does not appear that advice or recommendations are expressed in any these records. Additionally, from a review of the records withheld and the final version released to the Applicant, I am not persuaded that the release of the drafts would allow the Applicant to draw inferences of any information that would qualify as advice or recommendations. Based on this, I find that the first part of the test is not met for the drafts described in the preceding paragraph. Therefore, I find that Social Services has not properly applied subsection 17(1)(a) of FOIP to records 2, 49, 52, 64, 97, 123, 125, 132, 134, 137, 141, 143, 197, 206, 230, 237, 243, 257, 287 and 289. Social Services has also applied subsection 17(1)(b) of FOIP to these records. I will consider the application of this exemption later in this Report.



[83] Records 76 and 277 are documents that Social Services indicated “contain advice. The records are email chains including opinions from Communications regarding media updates.” This information would qualify as advice. Therefore, the first part of the test is met. Based on a review of the records, it appears that the records were developed by employees of Social Services. As such, I find that both parts of the test are met and as such that Social Services has properly applied subsection 17(1)(a) of FOIP to records 76 and 277. See the Appendix for details.

[84] Records 7, 9, 27, 32, 34, 54, 56 and 68 are described by Social Services as follows:

- Record 7 - “contains advice and policy options... regarding a proposed stop to a practice.”
- Record 9 - “contains three policy options that are presented as ways to respond to the issue of birth alerts.”
- Record 27 - “contains advice... document laying out options regarding birth alerts.”
- Records 32 and 34 - “contains advice, analysis and [sic] proposal... scan of other provinces as well as potential options...”
- Record 54 - “contains advice, analysis and [sic] proposal. The record is an... attachment regarding options and proposals.”
- Record 56 - “contains advice, analysis and [sic] proposal. The record contains... option and proposals.
- Record 68 - “contains advice and proposals... [the record is an] ... attachment of a briefing note regarding the elimination of birth alerts and potential plan for announcement.”

[85] Based on a review of the records above, the records describe an issue, propose options for a decision that need to be made, list the pros and cons to those options presented and identifies which of the options are recommended for Social Services to implement. Based on my review of these records, I am satisfied that the information would qualify as advice and policy options. As such, the first part of the test is met.

- [86] Social Services submission indicated that these records “are material created within MSS or Ministry of Health, both constitute a government institution.” I reviewed the records and the records involved various Social Services employees.
- [87] Records 7, 9, and 27 are attached to an email thread involving various government employees, including an Assistant Deputy Minister, Director and Executive Director, all with Social Services. Records 32, 34 and 56 are attached to emails from a Consultant with Social Services to a Director with Social Services. Record 54 is attached to an email thread involving various government employees, including a Consultant, Director and Executive Director, all with Social Services. Record 68 is attached to an email thread involving various government employees, including a Consultant and Executive Director, both with Social Services.
- [88] Based on review of the records, the records were developed by or for Social Services to make a decision about how to proceed regarding an issue. Additionally, based on the email threads that these records are attached to, it appears that they would have been developed by or for Social Services as well. As such, I am satisfied that the advice and policy options in these records were developed by or for Social Service; therefore, the second part of the test is met and find that Social Services properly applied subsection 17(1)(a) of FOIP to records 7, 9, 27 32, 34, 54, 56 and 68. I recommend Social Services continue to withhold these records pursuant to subsection 17(1)(a) of FOIP. See the Appendix for details.
- [89] Social Services also applied subsection 17(1)(a) of FOIP to record 280, which it refers to as a draft manual that shows draft policy changes that would disclose advice and proposals. The document itself does not appear to indicate what changes were made. As such, I am not persuaded that the record reveals any advice, proposals or analyses. As the first part of the test is not met, I find that Social Service did not properly apply subsection 17(1)(a) of FOIP to record 280. Social Services also applied subsection 17(1)(b) of FOIP to this record, so I will consider the application of that exemption later in this Report.

[90] Regarding factual information, in my office's [Review Report 317-2023](#), I reference [Order 97-007](#) from the Office of the Alberta Information and Privacy Commissioner who discusses the difference between a compilation of facts and analyses:

[43.] Upon reviewing the briefing notes, I note that there is no reference to a possible course of action for the Minister. In short, the briefing notes appear to be a narration or a status report. The authors of the briefing notes were not advising the Minister as to what he should do or not do, nor were they providing an analyses of the events using their expertise. "Analyses" is defined in the Concise Oxford Dictionary, 9th edition, (New York: Oxford, 1995) as:

a detailed examination of the elements or structure of a substance etc.; a statement of the result of this.

[44.] While there is some discretion exercised in choosing which facts are gathered, without more, a compilation of facts is not an analyses. Gathering pertinent factual information is only the first step that forms the basis of an analyses. It is also the common thread of "advice, proposals, recommendations, or policy options" because they all require, as a base, a compilation of pertinent facts.

[91] Records 12, 62, 63, 65, 86, 90, 91, 93, 95, 99, 106, 108, 122, 128, 129, 135, 138, 140, 144, 146, 148, 150, 152, 155, 166, 167, 173, 174, 176, 187, 211, 212, 213, 229, 265, 293, 294, 295, 301, 313 and 316 appear to contain a compilation of facts. As noted above, a compilation of facts is not analyses, and the compilation of facts is only the first step when developing advice, proposals, recommendations or policy options. Therefore, the information would not be considered advice, analyses, proposals or policy options. I find that the first part of the test is not met. As such, I find that Social Services did not properly apply subsection 17(1)(a) of FOIP to these records. Social Services has applied other exemptions to these records. As such, I will consider the application of these exemptions later in the Report.

[92] Social Services also applied subsection 17(1)(a) of FOIP to records that discuss a topic but only contain factual information. For example, record 40 is an email thread where clarification is sought regarding an existing policy. The response provides factual information about the policy. Records 117 and 118 are email threads where factual data and statistic on a topic are sought, and responses to that inquiry are provided. Records 170 and 171 are forms to be completed when referred to a program. Records 215 and 302 are

emails threads where a topic that may have media attention is discussed and outlines examples of issues that may appear in the media. Additionally, a portion of the information within record 214 was released in record 303, and so it would be an absurd result to withhold it from the Applicant here. Based on the above, the following records contain factual information and therefore, would not meet the first part of the test for subsection 17(1)(a) of FOIP: 40, 44, 77, 98, 104, 111, 112, 117, 118, 120, 127, 136, 142, 145, 147, 149, 154, 160, 162, 163, 169 to 172, 175, 182, 183, 186, 188 to 190, 193, 194, 196, 214, 216, 223, 226, 227, 241, 245, 251, 258, 261 to 264, 303, 311, 312, 314, 315, 319, 321, 324 and 325. As such, I find that Social Services has not properly applied subsection 17(1)(a) of FOIP. Social Services has applied other exemptions to these records; as such I will consider the application of other exemptions later in this Report.

[93] Social Services further applied subsection 17(1)(a) of FOIP to records it states would reveal the topic of a matter of a document and may discuss next steps in a process. In a review of the records, I am not persuaded that the information qualifies as advice, analyses or proposals. For example:

- Record 6 - references that an attachment has options to consider on a specified topic; however, the email thread does not contain any details about the content of the attachment.
- Record 31 - is an email where Social Services has redacted the subject line and name of the attachment that reveals what the attachment is, but the subject line itself does not reveal any details about the attachment.
- Record 69 - is an email thread. Social Services withheld the subject line and part of a sentence in the body of the email. The redacted portions identify the topic of a briefing note that the Assistant Deputy Minister's is to review and approve. The email does not contain any details about any advice, analyses or proposals related to the topic.
- Record 177 - is an email that contains information on documentation that needed to be submitted and due dates for the submission – it just contains general guidance.
- Records 290 and 291 - are an email and attachments advising of a concern raised by a member of public and sharing the email that was received. The email and attachment do not contain any advice, analyses or proposals related to the matter.

- [94] Based on these examples, the following records would not meet the first part of the test: 5, 6, 8, 10, 11, 13, 21, 22, 26, 28, 31, 33, 35, 43, 51, 53, 55, 59, 60, 61, 67, 69, 75, 79, 81, 85, 92, 94, 96, 105, 107, 109, 113, 119, 124, 130, 131, 133, 139, 151, 161, 168, 177, 178 to 181, 191, 205, 218, 228, 234, 236, 242, 247, 248, 252 to 254, 256, 267, 269 to 271, 278, 286, 288, 290 to 292, 298, 300, 304, 305, 309, 310 and 320. As the first part of the test is not met, I do not need to consider the second part and find that Social Services did not properly apply subsection 17(1)(a) of FOIP to these records. Social Services has also applied other exemptions to these records, so I will consider the application of these exemptions later in this Report.
- [95] Records 114 to 116 are records that pertain to a letter to the Minister and details regarding follow up to that letter. The information would not qualify as advice, analyses or proposals. As such, the first part of the test is not met. I find that Social Services has not properly applied subsection 17(1)(a) of FOIP. Social Services has also applied other exemptions to these records, I will consider the application of these exemptions later in this Report.
- [96] Social Services also withheld portions of records 36, 39, 199, 200, 203, 217, 231, 238 to 240, 249, 250, 259, 266, 296, 297 and 306. Information in these records includes the posing of questions or notice if further discussion on a matter should occur. For example, Social Services stated that record 36, “contains [sic] proposal... contains potential questions to be posed to other provinces.” From a review of the record, it is an email between Social Services employees brainstorming possible questions that could be posed to other provinces they want to consult with on a topic. For record 217, Social Services indicated that it “contains advice, analysis and [sic] proposal... a request for information regarding a scan [of other provinces].” The email is between Social Services’ employees and Social Services withheld the subject line and body of the email. The email is a draft of an information request for a scan to other provinces on a topic. I am not persuaded that the withheld information in these records qualifies as advice, analyses or proposals. As such, the first part of the test is not met and therefore, and I find that Social Services did not properly apply subsection 17(1)(a) of FOIP to these records. Social Services also applied

subsection 17(1)(b) of FOIP to these redacted records, so I will consider the application of this exemption later in this Report.

[97] Social Services also withheld portions of records that involve employees consulting on a particular topic. However, based on a review, I am not persuaded that the information would qualify as advice, proposals, or analyses. For example, record 50 includes information where employees are discussing a document they would like to develop based on a meeting. Record 126 is an email thread where an update on a program is sought, and a response is provided about the results on a program. Record 203 outlines the next steps that will be taken to finalize a matter. As such, the first part of the test is not met for records 50, 72 to 74, 100, 102, 126, 156, 159, 202, 209, 210, 215, 302, 303, 307, 308, 317 and 318. I find that Social Services has not properly applied subsection 17(1)(a) of FOIP to these records. Social Services also applied other exemptions to these portions of the records. I will consider the application of these exemptions later in this Report.

**6. Did Social Services properly apply subsection 17(1)(b) of FOIP?**

[98] Social Services applied subsection 17(1)(b) of FOIP to portions of records 2, 5 to 10 to 15, 19, 21, 22, 26 to 29, 31 to 36, 39, 40, 43, 44, 49 to 56, 59 to 69, 71 to 77, 79, 81, 85 to 100, 102, 104 to 109, 111 to 120, 122 to 152, 154 to 156, 159 to 163, 166 to 183, 186 to 191, 193, 194, 196, 197, 199 and 200, 202, 203, 205, 206, 209 to 218, 217, 223, 226 to 231, 234, 236 to 243, 245, 247 to 254, 256 to 259, 261 to 267, 269 to 271, 277, 278, 280, 286 to 298, 300 to 321, 324 and 325. However, as I have found that other exemptions apply to records 7, 9 19, 27, 29, 30, 32, 34, 54, 56, 68, 76 and 277, there is no need to consider the application of subsection 17(1)(b) of FOIP to them.

[99] Subsection 17(1)(b) 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:

...  
(b) consultations or deliberations involving:

- (i) officers or employees of a government institution;
- (ii) a member of the Executive Council; or
- (iii) the staff of a member of the Executive Council;

[100] The *Guide to FOIP*, Ch. 4 at page 136, provides that subsection 17(1)(b) of FOIP is a discretionary class-based exemption. It permits refusal of access in situations where release of a record could reasonably be expected to disclose consultations or deliberations involving officers or employees of a government institution, a member of the Executive Council or the staff of a member of the Executive Council.

[101] Page 136 of the *Guide to FOIP*, Ch. 4, provides that the provision is intended to allow persons having the responsibility to make decisions to freely discuss the issues before them in order to arrive at well-reasoned decisions. The intent is to allow such persons to address an issue without fear of being wrong, looking bad or appearing foolish if their frank deliberations were to be made public.

[102] Social Services' submission provides as follows:

The records indicated below contain both consultations and deliberations, including a number of different email exchanges between MSS and Ministry of Health and other provincial governments across Canada consulting on next steps, meeting agenda items, deliberating different options for the process of birth alerts.

The second part of the test requires a determination of whether 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. There is nothing in the exemption that limits the exemption to participation only of officers or employees of a government institution, a member of the Executive Council, or the staff of a member of the Executive Council. Collaboration with others is consistent with the concept of consultation (*Guide to FOIP*, Ch. 4, p. 133).

Unless otherwise indicated, the consultations and deliberations took place between officers or employees of the Ministry of Social Services and Ministry of Health who were responsible for decisions related to birth alerts. The email addresses of the individuals involved in the decision-making process are reflected in the documents submitted.

[103] Pages 136 to 138, of the *Guide to FOIP*, Ch. 4, provides the following two-part test for the application of subsection 17(1)(b) of FOIP:

1. Does the record contain consultations or deliberations?
2. Does 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?

[104] The *Guide to FOIP*, Ch. 4 at pages 128 to 133, provides the following definitions:

- “Consultation” means:
  - The act of consulting or taking counsel together; deliberation, conference.
  - A conference in which the parties consult and deliberate.

A consultation can occur when the views of one or more officers or employees of a government institution are sought as to the appropriateness of a particular proposal or suggested action. It can include consultations about prospective future actions and outcomes in response to a developing situation. It can also include past courses of action. For example, where an employer is considering what to do with an employee in the future, what has been done in the past can be summarized and would qualify as part of the consultation or deliberation.

- Deliberation means:
  - The act of deliberating (to deliberate; to weigh in mind; to consider carefully with a view to a decision; to think over) careful consideration with a view to a decision.
  - The consideration and discussions or the reasons for and against a measure by a number of councillors.

...

Factual material means a cohesive body of facts, which are distinct from advice, proposals, recommendations, analyses and/or policy options. A government institution can only withhold factual material or assertions of fact under subsection 17(1) of FOIP if the factual information is sufficiently interwoven with other advice, proposals, recommendations, analyses and/or policy options so that it cannot reasonably be considered separate and distinct. In other words, where factual information is intertwined with advice or recommendations in a manner whereby no reasonable separation can be made, then the information is not factual material and can be withheld.



[105] In my office's [Review Report 317-2023](#), I referred to [Order F2013-13](#) by Alberta's Office of the Information and Privacy Commissioner. The AB IPC explained the words "consultations" and "deliberations" set out in subsection 24(1)(b) of Alberta's *Freedom of Information and Protection of Privacy Act* which is the equivalent of subsection 17(1)(b) of FOIP:

[para 146] I agree with the interpretation Commissioner Clark assigned to the terms "consultation" and "deliberation" generally. However, as I stated in Order F2012-10, section 24(1)(b) differs from the section 24(1)(a) in that section 24(1)(a) is intended to protect communications developed for a public body by an advisor, **while section 24(1)(b) protects communications involving decision makers. That this is so supported by the use of the word deliberation: only a person charged with making a decision can be said to deliberate that decision. Moreover, "consultation" typically refers to the act of seeking advice regarding an action one is considering taking, but not to giving advice in relation to it.** Information that is the subject of section 24(1)(a) may be voluntarily or spontaneously provided to a decision maker for the decision maker's use because it is the responsibility of the employee to provide information of this kind; however, such information cannot be described as a "consultation" or a "deliberation". Put simply, section 24(1)(a) is concerned with the situation where advice is given, section 24(b) is concerned with the situation where advice is sought or considered.

[Emphasis added]

[106] Records 100 and 102 are an email thread regarding a media briefing. In the email threads, Social Services' employees are discussing responses to media inquiries. Social Services' submission provides the following regarding these records:

...contains consultations and deliberations. The records are email chains including opinions from Communications regarding media updates... as it relates to current practice of Birth Alerts.

[107] The email thread at record 100 and 102 share the proposed media update responses and clarify how a factual statistical figure was reached. The records also contain an opinion about a key message that should be included. However, it does not appear that the records contain any consultations or deliberations on the matter. As the first part of the test is not met, I find that Social Services did not properly apply subsection 17(1)(b) of FOIP to these records. As there are no other exemptions to review, I recommend Social Services release these records to the Applicant within 30 days of the issuance of this Report.

[108] Records 88 and 253 are email threads that Social Services describes as follows:

- Record 88 - The email thread are details provided to officials with respect to [Social Services'] interactions with a CBO...
- Record 253 - The record contains consultations and deliberations, opinion as to if the practice of notifying the hospital with respect to concerns and disclosure falls under 74(1) from the privacy unit of [Social Services].

[109] Portions of these email threads include consultations within Social Services regarding a practice and responses related to their inquiry. Additionally, the email threads contain deliberations by a Social Services employee regarding the development of a document. As such, I find that the first part of the test is met to those portions. Other redacted portions, such as the subject lines and discussion about locating a specific document, would not qualify as consultations and deliberations.

[110] The second part of the test is met as the consultations and deliberations involve employees of Social Services. As such, I find that Social Services has properly applied subsection 17(1)(b) of FOIP to portions of records 88 and 253. I recommend Social Services continue to withhold the portions of records 88 and 253. See the Appendix for details.

[111] I note that Social Services also applied subsection 17(1)(b) of FOIP to record 280, which it refers to as a draft manual and claims it contains consultations and deliberations of draft policy changes. The document itself does not appear to show any changes to the policy document. I am not persuaded that the record reveals any consultations or deliberations. As such, the first part of the test is not met, and I find that Social Services did not properly apply subsection 17(1)(b) of FOIP to these records. I recommend Social Services release record 280 within 30 days of the issuance of this Report.

[112] In my office's [Review Report 313-2023](#), I referred to [Order F2017-65](#) when factual information can constitute part of the consultations or deliberations as follows:

In some circumstances, factual information can be conveyed that makes it clear a decision is called for, and what is recounted about the facts provides background for a decision that is to be made. Such a case involves more than merely "a bare recitation

of facts”. Rather, what is recounted about particular events or the way in which they are presented may be said to constitute part of the ‘consultations or deliberations’ a decision maker uses to develop a decision. This may be so whether the decision maker specifically requests the information, or it is provided unsolicited having regard to the responsibilities of both the provider and receiver.

[113] Social Services also applied subsection 17(1)(b) of FOIP to records that discuss a topic but only contain factual information. I previously discussed some of these pages in the review of subsection 17(1)(a) of FOIP and concluded they contained factual information. The following records contain factual information and would not meet the first part of the test: 14, 15, 40, 44, 71 to 74, 77, 87, 89, 98, 104, 111 to 114, 117, 118, 120, 126 to 130, 133, 136, 142, 145, 147, 149, 151, 152, 154, 156, 159, 160, 162, 163, 166, 169 to 173, 175, 182, 183, 186, 188, 189, 190, 193, 194, 196, 205, 209, 214 to 216, 223, 226, 227, 241, 245, 252, 258, 261 to 265, 296, 301 to 303, 307, 311 to 317 to 319, 321, 324 and 325. As such, I find that Social Services has not properly applied subsection 17(1)(b) of FOIP to these records. I recommend, therefore, that Social Services release these portions of these records within 30 days of the issuance of this Report. See the Appendix for details. One exception I note is that Social Services has applied other exemptions to records 126 and 127, and so I will consider the application of these other exemptions to records 126 and 127 later in this Report.

[114] Records 2, 12, 49, 52, 62, 63, 64, 65, 86, 90, 91, 93, 95, 99, 106, 108, 115, 116, 122, 123, 125, 132, 134, 135, 137, 138, 140, 141, 143, 144, 146, 148, 150, 155, 167, 174, 176, 187, 197, 206, 211, 212, 213, 229, 230, 237, 243, 257, 287, 289, and 293 to 295 are summary documents and briefing notes. Social Services described these records as follows:

- Records 2 and 49 – contains consultations, taking place between MSS and the Ministers office.
- Record 12 - contains “consultations and deliberations involving the Ministry and parents with lived experience.”
- Record 52 – contains consultation and deliberations... regarding workshops and potential guest list...

- Records 62, 63, 64 and 65 - “contains consultations and deliberations. The record is draft documents describing information collected regarding Federal Bill C-92 and potential impact on Saskatchewan...”
- Records 86, 93, 95, 99, 106, 108, 115, 116, 125, 132, 134, 135, 137, 138, 140, 141, 143, 144, 146, 148, 150, 155, 167, 174, 206, 229, 230, 237, 243, 257, 287, 289, 293 to 295 - “contains consultations and deliberations... the attached briefing notes related to birth alerts and services provided in the community...”
- Records 90 and 91 - “contains consultations and deliberations... the attachments are details and advice provided to officials with respect to [Social Services] interactions with a CBO and proposed expansion of services.”
- Record 122 and 123 - contains consultations. The email thread is calling out for updating briefing materials for the new fiscal year.
- Record 187 - “contains consultations and deliberations.” This record “contain analysis from [Social Services] perspective on items...”
- Record 197 – contains consultations and deliberations. The information relates to a consultation that resulted in the creation of a processing improvement document.
- Records 211, 212 and 213 - “contains consultations and deliberations.” These records “relates to current practice of Birth Alerts.”

[115] From a review, these are summary documents and briefing notes that appear to contain factual information on various topics. It does not appear that these records contain any consultations or deliberations on the topics. I find that the first part of test is not met. As such, I find that Social Services has not properly applied subsection 17(1)(b) of FOIP to these records and recommend it release these records to the Applicant within 30 days of the issuance of this Report. See Appendix for details. The exception I note to this is that Social Services applied other exemptions to records 90 and 91, and so I will consider the application of the other exemptions to these records later in the Report.

[116] Social Services applied subsection 17(1)(b) of FOIP to records that it states reveal the topic of a matter or a document, and the next steps in a process. Based on a review of the records, I am not persuaded the information qualifies as consultations or deliberations. For example, record 31 is an email where only the subject line and name of the attachment, which does not reveal any details about the attachment, have been redacted. Record 69 is an email

thread. Social Services withheld the subject line and part of a sentence in the body of the email. The redacted portions identify the topic of a briefing note that the Assistant Deputy Minister is to review and approve. The email does not contain details about any consultations or deliberations related to the topic. Record 177 is an email where information is provided on required documentation and due dates. There do not appear to be any details about any specific topic; the email thread just includes general guidance on required updates. The following records do not meet the first part of the test: 5, 6, 8, 10, 11, 13, 21, 22, 26, 28, 31, 33, 35, 43, 50, 51, 53, 55, 59, 60, 61, 66, 67, 69, 75, 79, 81, 85, 92, 94, 96, 105, 107, 109, 119, 124, 131, 139, 161, 168, 177 to 181, 191, 210, 218, 228, 234, 236, 237, 242, 247, 248, 254, 256, 267, 269, 270, 271, 278, 286 to 288, 292, 300, 304, 305, 309, 310 and 320. Therefore, I find that Social Services has not properly applied subsection 17(1)(b) of FOIP to these records and I recommend it release these portions of records within 30 days of the issuance of this Report. See Appendix for details. As an exception to this, I note that Social Services applied other exemptions to records 66, 109, 179 and 180. I will consider the application of those exemptions later in this Report.

[117] Social Services also withheld portions of records 36, 39, 199, 200, 202, 203, 217, 231, 238 to 240, 249 to 251, 259, 266, 297, 306 and 308. From a review of these records, it appears that the information withheld include questions posed or indicate that further discussion should occur on a specific topic. I am not persuaded that the withheld information qualifies as consultations or deliberations. For example, record 50 contains discussions by employees about a document they would like to develop based on a meeting. Record 126 is an email thread wherein an update on a program is sought and a response is provided. Record 203 outlines the next steps that will be taken to finalize a matter. As the first part of the test is not met, I find that Social Services did not properly apply subsection 17(1)(b) of FOIP to these records. See Appendix for details. I recommend Social Services release these portions of the records within 30 days of the issuance of this report.

**7. Did Social Services properly apply subsection 16(1) of FOIP?**

[118] I will only need to consider the application of subsection 16(1) of FOIP to portions of records 111, 112, 114 to 116, 119, 122 to 130, 139 to 155, 158, 165 to 176, 205, 206, 228 to 230, 254, 290, 291, 293 to 295, 304, 305, 309, 310, 312 and 313.

[119] Subsection 16(1) of FOIP is a mandatory class-based provision. Subsections 16(1)(a) through (d) of FOIP are not an exhaustive list. Therefore, even if none of the subsections are found to apply, the introductory wording of subsection 16(1) of FOIP must still be considered. In other words, is the information a confidence of Executive Council? (*Guide to FOIP*, Chapter 4, “Exemptions from the Right of Access”, updated October 18, 2023 [*Guide to FOIP*, Ch. 4], p. 95).

[120] Pages 96 to 98 of the *Guide to FOIP*, Ch. 4, provide the following definitions:

- “Cabinet confidences” are generally defined as, in the broadest sense, the political secrets of Ministers individually and collectively, the disclosure of which would make it very difficult for the government to speak in unison before Parliament and the public.
- “Including” means that the list of examples of what could be considered a Cabinet, confidence following the introductory wording at subsection 16(1) is non-exhaustive.

[121] Subsection 16(1) of FOIP provides:

**16(1)** A head shall refuse to give access to a record that discloses a confidence of the Executive Council, including:

- (a) records created to present advice, proposals, recommendations, analyses or policy options to the Executive Council or any of its committees;
- (b) agendas or minutes of the Executive Council or any of its committees, or records that record deliberations or decisions of the Executive Council or any of its committees;
- (c) records of consultations among members of the Executive Council on matters that relate to the making of government decisions or the formulation of government policy, or records that reflect those consultations;

(d) records that contain briefings to members of the Executive Council in relation to matters that:

(i) are before, or are proposed to be brought before, the Executive Council or any of its committees; or

(ii) are the subject of consultations described in clause (c).

[122] Page 98 of the *Guide to FOIP*, Ch. 4, provides that “Cabinet confidences” are generally defined as, in the broadest sense, the political secrets of Ministers individually and collectively, the disclosure of which would make it very difficult for the government to speak in unison before Parliament and the public.

[123] The *Guide to FOIP*, Ch. 4 at page 99, provides that the word “including” set out in subsection 16(1) means the list of the information that follows is non-exhaustive. The examples in the provision are the types of information that could be presumed to disclose a confidence of Executive Council (Cabinet).

[124] In my office’s [Review Report 311-2016](#), the Commissioner noted that in order for 16(1) of FOIP to apply, the government institution must demonstrate that the records were intended for Executive Council (Cabinet) or on of its committees.

[125] Social Services’ submission outlines that the information at issue relates to a Treasury Board decision, briefing notes and other documents prepared for the Minister, information prepared for Executive Council to approve, and documents prepared for the Premier. Its submission further provides that the release of these records would disclose a confidence of the Executive Council.

[126] At paragraph [11] of my office’s Review [Report 004-2018](#), I stated the following:

[11] Executive Council consists of the Premier and Cabinet Ministers. Executive Council is also referred to as “Cabinet” (Government of Saskatchewan, *Cabinet Secretariat, Executive Council, Executive Government Processes and Procedures in Saskatchewan: A Procedures Manual, 2007*, at p. 16). Treasury Board is a committee of the Executive Council and is therefore also captured by the exemption. (Review Report 041-2015 at paragraph [8])

[127] In my office's [Review Report 004-2024](#), I referenced a Supreme Court of Canada decision, [Ontario \(Attorney General\) v. Ontario \(Information and Privacy Commissioner\), 2024 SCC 4 \(CanLII\)](#), in which it was determined deliberations by Cabinet would include "topics of deliberations":

[62] Such an approach reflects the opening words of s. 12(1), which mandate a substantive analysis of the requested record and its substance to determine whether disclosure of the record would shed light on Cabinet deliberations, rather than categorically excluding certain types of information from protection. **Thus, "deliberations" understood purposively can include outcomes or decisions of Cabinet's deliberative process, topics of deliberation, and priorities identified by the Premier, even if they do not ultimately result in government action.** And decision makers should always be attentive to what even generally phrased records could reveal about those deliberations to a sophisticated reader when placed in the broader context. The identification and discussion of policy priorities in communications among Cabinet members are more likely to reveal the substance of deliberations, especially when considered alongside other available information, including what Cabinet chooses to do.

[Emphasis added]

[128] Based on a review, my office noted that the information redacted pursuant to subsection 16(1) of FOIP contains topics of deliberations and priorities identified by Executive Council. I find that Social Services properly applied subsection 16(1) of FOIP to records 111, 112, 114 to 116, 119, 122 to 130, 139 to 155, 158, 165 to 176, 205, 206, 228, 229, 230, 254, 290, 291, 293 to 295, 304, 305, 309, 310, 312 and 313. As such, I recommend Social Services continue to withhold these records pursuant to subsection 16(1) of FOIP. See the Appendix for details.

[129] Additionally, Social Services had not claimed subsection 16(1) of FOIP to records 90, 91, 135, 138, 212 and 213. Based on my review of the records, these six pages appear to consist of draft briefing notes for the Minister of Social Services, which I have previously found the exemption would extend to include (see paragraph [15] of [Review Report 028-2019](#)). As I have found that subsection 16(1) of FOIP applies in other portions of the records, this mandatory exemption should be applied to the same information in a consistent manner to protect Cabinet confidences. As such, I find that subsection 16(1) of FOIP applies to these



portions of the records. I recommend that Social Services continue to withhold these records pursuant to subsection 16(1) of FOIP. See the Appendix for details.

[130] As I have found subsection 16(1) of FOIP applies to these portions of records 90, 91, 111, 112, 114 to 116, 119, 124, 126, 135, 139, 140, 142 to 155, 158, 165 to 176, 228, 229, 254, 290, 291, 293 to 295, 304, 305, 309, 310, 312 and 313. There is no need to consider the application of any other exemptions claimed.

**8. Did Social Services properly apply subsection 17(1)(c) of FOIP?**

[131] I only need to consider the application of subsection 17(1)(c) of FOIP to portions of records 66, 87 to 89, 109, 110, 114, 152, 168 to 171, 179 and 180. Social Services had also applied subsection 17(1)(c) of FOIP to records 90 and 91, however as I have already found subsection 16(1) of FOIP to apply, there is no need to consider the application of this exemption.

[132] Subsection 17(1)(c) 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:

...

(c) positions, plans, procedures, criteria or instructions developed for the purpose of contractual or other negotiations by or on behalf of the Government of Saskatchewan or a government institution, or considerations that relate to those negotiations;

[133] Page 142 of the *Guide to FOIP*, Ch. 4, provides that subsection 17(1)(c) 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 positions, plans, procedures, criteria or instructions developed for the purpose of contractual or other negotiations by or on behalf of a government institution. It also covers considerations released to those negotiations. Examples of the type of information that could be covered by this exemption

are the various positions developed by government institution's negotiations in relation to labour, financial and commercial contracts.

[134] The *Guide to FOIP*, Ch. 4 at pages 142 to 145, provides the following test that can be applied for the application of subsection 17(1)(c) of FOIP:

1. Does the record contain positions, plans, procedures, criteria, or instructions?
  - a. Developed for the purpose of contractual or other negotiations.
  - b. By or on behalf of the government institutions.
2. Or does the record considerations that relate to those negotiations?

[135] Social Services' submission provided that records 66 and 87 to 89 contain considerations that relate to negotiations, and that records 109, 110, 114, 168 to 171, 179 and 180 contain the plans by the government institution. Social Services submission did not provide arguments for its application of 17(1)(c) of FOIP to record 152.

[136] The *Guide to FOIP*, Ch. 4 at pages 143 and 144, provides the following definitions:

- “Criteria” are standards, rules or tests on which judgement or decisions can be based or compared; a reference point against which other things can be evaluated.
- A “plan” is a formulated and especially detailed method by which a thing is to be done; a design or scheme. A detailed proposal for doing or achieving something; an intention or decision about what one is going to do.
- A “negotiation” is a consensual bargaining process in which the parties attempt to reach agreement on a disputed or potentially disputed matter. It can also be defined as dealings conducted between two or more parties for the purpose of reaching an understanding. It connotes a more robust relationship than consultation. It signifies a measure of bargaining power and a process or back-and-forth, give-and-take discussion.

There must be a clear indication that the information was “developed for the purpose of” negotiations. There must be a clear indication that the negotiations were in mind when the record was developed.

[137] Social Services' submission only states that the records were "developed for the purpose of ongoing negotiations by a government institution or considerations that relate to those negotiations." Aside from this, Social Services did not provide additional details to support its assertion. However, based on a review of the records, it appears they consist of discussions, an overview of a program, a table with financial/budget information and a workplan for a department of Social Services. As such, I find that the first part of the test is not met, and that Social Services did not properly apply subsection 17(1)(c) of FOIP to these records. See the Appendix for details. As Social Services applied 18(1)(b) and (d) of FOIP to portions of these records, I will consider the application of those exemptions later in this Report.

**9. Did Social Services properly apply subsection 29(1) of FOIP?**

[138] Social Services applied subsection 29(1) of FOIP to portions of records 19, 39, 40, 45, 48, 58, 66, 115, 128 to 130, 159, 163, 202, 227, 246, 255, 260, 268, 290, 291, 296, 298, 299, 306, 309, 315 and 318.

[139] Subsection 29(1) of FOIP provides:

**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.

[140] Section 29 of FOIP prohibits the disclosure of personal information unless the individual about whom the information pertains to consents to its disclosure or if the disclosure without consent is authorized by one of the enumerated subsections of 29(2) or section 30 of FOIP (*Guide to FOIP*, Chapter 6, "Protection of Privacy", updated February 27, 2023 [*Guide to FOIP*, Ch. 6], p. 186).

[141] To qualify as personal information as defined by subsection 24(1) of FOIP, the information must: 1) be about an identifiable individual; and 2) be personal in nature. Information is about an "identifiable individual" if the individual can be identified from the information

(e.g., their name is provided) or if the information, when combined with information otherwise available, could reasonably allow the individual to be identified. To be “personal in nature” means the information provides something identifiable about the individual (*Guide to FOIP*, Ch. 6, pp. 32-33).

[142] In this review, subsections 24(1) (a), (b), and (k) of FOIP are relevant, and provide as follows:

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

...

(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;

...

(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.

[143] Social Services’ submission noted that it withheld names and contact information from the following records: 19, 39, 66, 159, 163, 202, 260, 268, 296, 306, 309, 315 and 318.

[144] Based on the arguments provided by Social Services and a review of the records noted, it appears that the names of individuals and contact information associated are in a professional and not a personal capacity. In my office’s [Review Report 186-2019](#) and [Review Report 126-2022](#), I found that business contact information is not personal in nature and should be released. Because of this, I find Social Services did not properly apply subsection 29(1) of FOIP to this type of information and recommend it release this information to the Applicant within 30 days of the issuance of this Report. See the Appendix for details.

[145] Social Services' submission provides that it has withheld the names of members of the public and details that could reveal information that is personal in nature. While Social Services has not specified a subsection that defines this information as personal information, a review of the records shows that information would qualify as personal information pursuant to subsection 24(1)(k)(ii) of FOIP in records 40, 48, 227, 255, 291, 298 and 299. Social Services also applied subsection 29(1) of FOIP to records 227 and 255; however, Social Services noted that these records should have been redacted under subsection 74(1) of the CFSA. Regardless, the information would qualify as personal information as defined by subsection 24(1)(k)(ii) of FOIP. As such, I find that Social Services has properly applied subsection 29(1) of FOIP to those portions of records 40, 48, 115, 128 to 130, 225, 227, 290, 291, 298 and 299. I recommend that Social Services continue to withhold those portions of the records. See the Appendix for details.

[146] Additionally, while Social Services has not applied subsection 29(1) of FOIP to record 2, I note that this record identifies an individual and contains their email address. The release of this information would reveal information that is personal in nature about the individual and would qualify as personal information as defined by subsection 24(1)(k)(i) of FOIP. As such, I find that subsection 29(1) of FOIP applies to a portion of record 2. I recommend Social Services continue to withhold this portion of the record. See the Appendix for details.

[147] Social Services' submission provides that records 45 and 246 relate to personal information about an employee's attendance at the office or at a meeting. Based on a review of the records, it appears that details in record 45 references another meeting they will be attending that relates to their professional capacity. It does not appear this information would reveal anything that would be considered to be personal in nature. As this information would not qualify as personal information as defined at subsection 24(1) of FOIP, I find that Social Services did not properly apply subsection 29(1) of FOIP to this portion of record 45. I recommend that Social Services release this portion of record 45 within 30 days of the issuance of this Report. See the Appendix for details. Record 246 references time away from the office for an employee and based on a review of this record,

it appears this instance would qualify as “employment history” as defined by subsection 24(1)(b) of FOIP. As such, I find that Social Services has properly applied subsection 29(1) of FOIP to this portion of the record. I recommend Social Services continue to withhold this portion of record 246. See the Appendix for details.

[148] Record 58 is a Provincial Summary of Infant Interventions from Hospitals for January 1 to September 30, 2020. Social Services released all of the information from this summary with the exception of one detail that was an outlier to all of the other infant interventions during that 9-month period.

[149] The *Guide to FOIP*, Chapter 6, (*Guide to FOIP*, Ch. 6) at pages 19 to 21 and 33, provides the following definitions about quasi-identifiers and if the information is about an identifiable individual:

“Indirect or quasi-identifiers” are fields of information that may be used on their own or in combination with other indirect or quasi-identifiers, or other information, to indirectly identify an individual. They include information such as gender, marital status, race, ethnic origin, postal code or other location information, significant dates, or one’s profession. Some indirect or quasi-identifiers may be more likely to lead to the re-identification of individuals in a data set due to their rare occurrence. Characteristics which are highly uncommon in the population or in the data set, such as an unusual occupation or medical diagnosis, can increase the likelihood of the identity of an individual being revealed.

...

Examples of quasi-identifiers can include sex, date of birth or age, geo-codes, first language, ethnic origin, aboriginal identity, total years of schooling, marital status, criminal history, total income, visible minority status, profession, health event dates, health-related codes, country of birth, birth weight, and birth plurality.

Sufficient quasi-identifiers make it possible to identify an individual even in absence of a name, either on their own or in combination.

...

Information is about an identifiable individual if:

The individual can be identified from the information (e.g., name, where they live);  
or

The information, when combined with information otherwise available, could reasonably be expected to allow the individual to be identified.

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

[150] Based on my review of the record, it does not appear that the release of this information when combined with the information released in this record could reasonably be expected to allow for the identification of an identifiable individual. As there does not appear to be an identifiable individual from the information in this record, I find that this information would not qualify as personal information. As such, I find that Social Services has not properly applied subsection 29(1) of FOIP to record 58.

[151] In conclusion, I find Social Services properly applied subsection 29(1) of FOIP to some records, but not others. See Appendix for details.

#### **10. Did Social Services properly apply subsection 18(1)(b) of FOIP?**

[152] Social Services applied subsection 18(1)(b) of FOIP to portions of records 47, 66, 109, 110, 151 and 152. However, I have already found that subsection 16(1) of FOIP applies to records 151 and 152. As such, I will only consider the application of 18(1)(b) of FOIP to the remaining records.

[153] Subsection 18(1)(b) of FOIP provides:

**18(1)** A head may refuse to give access to a record that could reasonably be expected to disclose:

...

(b) financial, commercial, scientific, technical or other information:

(i) in which the Government of Saskatchewan or a government institution has a proprietary interest or a right of use; and

(ii) that has monetary value or is reasonably likely to have monetary value;

[154] Page 170 of the *Guide to FOIP*, Ch. 4, provides that subsection 18(1)(b) of FOIP is a discretionary class-based exemption. It permits refusal of access in situations where release of a record could reasonably be expected to disclose financial, commercial, scientific, technical or other information which the Government of Saskatchewan or a government institution has a proprietary interest or a right of use and which has monetary value or reasonably likely to have monetary value.

[155] The *Guide to FOIP*, Ch. 4 at pages 170 to 172, provides the following three-part test for the application of subsection 18(1)(b) of FOIP:

1. Does the information contain financial, commercial, scientific, technical or other information?
2. Does the government institution have a proprietary interest or a right to use it?
3. Does the information have monetary value for the government institution or is it reasonably likely to?

[156] Social Services' submission provided as follows regarding the application of subsection 18(1)(b) of FOIP:

Record 47 - outlining the maternal wellness programming in Saskatchewan and written by the Ministry of Health. The appendix lists maternal and new born support programs. The exemption was applied to the annual funding column.

...

Record 109 - The name of the attachment is withheld as that discloses a proposal funding request from a CBO [name of CBO] for a Mental Health Home.

Record 110 - This is a proposal document from [name of CBO] for a new Mental Health Home. This proposal would require a significant financial investment from [Social Services].

...

The IPC's test is met for the above records. All contain financial information [Social Services] has a proprietary interest in and have monetary value. The Ministry submits that it has demonstrated the exemption has been properly applied.



[157] Pages 170 to 173 of the *Guide to FOIP*, Ch. 4, provide the following definitions:

- “Financial information” is 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 particular party.
- “Proprietary” means of, relating to or holding as property.
- “Proprietary information” is the interest held by a property owner together with all appurtenant rights, such as stockholder’s right to vote the shares. It signifies simply “interest as an owner” or “legal right or title.”
- “Monetary value” requires that the information itself have an intrinsic value. This may be demonstrated by evidence of potential financial return to the government institution. An example of information that is reasonably likely to have value might include a course developed by a teacher employed by a school board.

The mere fact that the government institution incurred a cost to create the record does not mean it has monetary value for the purposes of this section.

[158] My office’s [Review Report 317-2023](#), references an Order from Ontario’s Office of the Information and Privacy Commissioner as follows:

[67] I note that subsection 11(a) of Ontario’s Municipal Freedom of Information and Protection of Privacy Act (ON MFIPPA) is similar to subsection 18(1)(b) of FOIP. In [Order M-654](#), Ontario’s Office of the Information and Privacy Commissioner (ON IPC) explained the purpose of subsection 11(a) of ON MFIPPA:

The use of the term “monetary value” in section 11(a) requires that the information itself have an intrinsic value. The purpose of section 11(a) is to permit an institution to refuse to disclose a record which contains information **where circumstances are such that disclosure would deprive the institution of the monetary value of the information...**

[68] Therefore, in order for information to be exempted pursuant to subsection 18(1)(b) of FOIP, the information itself must have monetary value for Health.

[Emphasis added]

[159] Record 47 is a table of programs with the Annual Funding column severed. Records 66 and 109 are email threads related to upcoming meetings. Record 110 is an attachment to record 109 and appears to be a brief overview of the program. While record 47 appears to

qualify as financial information, it is unclear how records 109 and 110 qualify as financial, commercial, scientific, or other information. It is also unclear how disclosure of any of the information would deprive Social Services of the monetary value of the information, which is a key consideration for subsection 18(1)(b) of FOIP to apply. As Social Services has not demonstrated this, I am not convinced that the third part of the test can be met. As such, I find that Social Services has not properly applied subsection 18(1)(b) of FOIP. See Appendix for details. I recommend Social Services release record 47 within 30 days of the issuance of the Report. Social Services also applied subsection 18(1)(d) of FOIP to records 66, 109 and 110. I will consider the application of that exemption in the next section of the Report.

#### **11. Did Social Services properly apply subsection 18(1)(d) of FOIP?**

[160] Social Services applied subsection 18(1)(d) of FOIP to portions of records 66, 87, 88, 109, 110, 114, 126, 127, 128, 129, 130, 152, 168, 169, 170, 171, 179 and 180. Records 88, 91, 127, 128, 129, 130, 152, 168, 169, 170 and 171, I have already found that other exemptions apply. I will only consider the remaining records. Social Service had also applied subsection 18(1)(d) of FOIP to portions of records 89. However, Social Services submission indicated it was no longer relying on this exemption for these records. As such, I recommend that Social Services release these portions of the record within 30 days of the issuance of the Report. See the Appendix for details.

[161] Subsection 18(1)(d) of FOIP provides:

**18(1)** A head may refuse to give access to a record that could reasonably be expected to disclose:

...

(d) information, the disclosure of which could reasonably be expected to interfere with contractual or other negotiations of the Government of Saskatchewan or a government institution;

[162] Page 180 of the *Guide to FOIP*, Ch. 4, provides that subsection 18(1)(d) of FOIP is a discretionary harm-based exemption. It permits refusal of access in situations where release

of a record could reasonably be expected to interfere with contractual or other negotiations of the Government of Saskatchewan or a government institution.

[163] The *Guide to FOIP*, Ch. 4 at pages 180 and 181, provide the following two-part test for the application of subsection 18(1)(d) of FOIP:

1. Are there contractual or other negotiation occurring involving the Government of Saskatchewan or a government institution?
2. Could release of the record reasonably be expected to interfere with the contractual or other negotiations?

[164] The *Guide to FOIP*, Ch. 4 at pages 180 to 183, provides the following definitions:

A “negotiation” is a consensual bargaining process in which the parties attempt to reach agreement on a disputed or potentially disputed matter. It can also be defined as dealings conducted between two or more parties for the purpose of reaching an understanding. It connotes a more robust relationship than consultation. It signifies a measure of bargaining power and a process or back-and-forth, give-and-take discussion.

...

Once a contract is executed, negotiation is concluded. The exemption would generally not apply unless, for instance, the same strategy will be used again, and it has not been publicly disclosed.

...

“Interfere” means to hinder or hamper.

...

Government institutions should not assume that the harm is self-evident. The harm must be described in a precise and specific way in order to support the application of the provision.

...

Examples of information to which this exemption may apply include negotiating positions, options, instructions, pricing criteria and points used in negotiations.

[165] Social Services’ submission provides as follows:

Government annually reports the funding provided to a variety of organizations etc. through Volume 2 of Public Accounts. This report lists totals paid to an organization

by ministry division; details of the categories is not made public. The categories and funding vary between organizations based on the services the organization provides and the support needed to provide those services. The needs of the people of Saskatchewan and the services provided by MSS shift rapidly, the release of financial information could negatively impact the Ministry's ability to negotiate with human service agencies as necessary and ongoing throughout the fiscal year...

[166] Records 66 and 109 are emails threads related to upcoming meetings. Record 110 is an attachment to record 109 and appears to be a brief overview of the program. Records 87, 114 and 126 disclose discussions relating to a program that Social Services was considering implementing. Records 179 and 180 contain workplan documents relating to work for a department of Social Services. While it appears that there was some brief discussion in some of these records about the program, Social Services did not provide adequate arguments for me to be persuaded that it would interfere with negotiations, including if they were ongoing or how the information may be used in future negotiations. The first part of the test is met when a government institution demonstrates this is the case. Further, I note that the Government of Saskatchewan website announced the partnership with the two programs that appear to be discussed in these records, one in late 2023 and the other in early 2024. This further negates the notion that the first part of the test is met.

[167] As such, I find that Social Services did not properly apply subsection 18(1)(d) of FOIP to these records. See the Appendix for details. As such, I recommend Social Services release these portions of the records within 30 days of the issuance of this Report.

#### **IV FINDINGS**

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

[169] I find that pursuant to subsection 23(3)(c) of FOIP, the confidentiality provisions found in section 74 of the CFSA would prevail over some of the records.

[170] I find that Social Services has made a *prima facie* case that subsection 22(a) of FOIP applies to some portions of the records, but not others, as outlined in the Appendix, with the exception of the headers, footers, subject lines and confidentiality statements in any emails.

[171] I find that Social Services has properly applied subsections 13(1)(b), 16(1), 17(1)(a), 17(1)(b) and 29(1) of FOIP to some portions of the records, but not others, as outlined in the Appendix.

[172] I find that Social Services did not properly apply subsections 17(1)(c), 18(1)(b) and 18(1)(d) of FOIP to the records.

## **V RECOMMENDATIONS**

[173] I recommend that Social Services should ensure to make reference to subsection 7(2)(b) of FOIP when some of the requested records are published and it is referring an applicant to those publications.

[174] I recommend that Social Services release to the Applicant the non-responsive records, categorized as duplicates and outside of the timeframe, subject to exemptions, within 30 days of the issuance of this Report.

[175] I recommend that Social Services take no further actions regarding records where section 74 of the CFSA has been found to prevail.

[176] I recommend that Social Services continue to withhold records where it has been found that it has made a *prima facie* case that subsection 22(a) of FOIP applies, with the exception of the headers, footers, subject lines and confidentiality statements in any emails.

[177] I recommend that within 30 days of the issuance of this Report, Social Services continue to withhold or release the records as outlined in the Appendix.

Dated at Regina, in the Province of Saskatchewan, this 17th day of July, 2024.

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

## Appendix

<b>Record #</b>	<b>Page #</b>	<b>Severance #</b>	<b>FOIP Exemption(s) applied</b>	<b>Withheld in Full or in Part</b>	<b>Description</b>	<b>IPC Findings</b>	<b>IPC Recommendations</b>
2	Part 1, 2	2:1	17(1)(a), 17(1)(b)	Withheld in full	Draft Letter	17(1)(a) and (b) of FOIP do not apply  29(1) of FOIP applies to the name and email address of the individual	Release, with the exception of the name and email address of individual
3	Part 1, 3-4	3:1, 4:1	22(a)	Withheld in full	Email thread Containing solicitor-client privilege	22(a) of FOIP applies, with the exception of headers, footers, subject lines and confidentiality	Withhold, with the exception of headers, footers, subject lines and confidentiality
4	Part 1, 5-6	5:1, 6:1	22(a)	Withheld in full	Email thread Containing solicitor-client privilege	22(a) of FOIP does not apply	Release
5	Part 1, 7	7:1-2	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
6	Part 1, 8-9	8:1-7	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
7	Part 1, 10-11	10:1, 11:1	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Attachment to p8	17(1)(a) of FOIP applies	Withhold
8	Part 1, 12-13	12:1-5, 13:1	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
9	Part 1, 14-20	14:1, 15:1, 16:1, 17:1, 18:1  19:1, 20:1	17(1)(a), 17(1)(b)  13(1)(b), 17(1)(a), 17(1)(b)	Withheld in full	Attachment to p12	17(1)(a) of FOIP applies  13(1)(b) of FOIP does not apply	Withhold

<b>Record #</b>	<b>Page #</b>	<b>Severance #</b>	<b>FOIP Exemption(s) applied</b>	<b>Withheld in Full or in Part</b>	<b>Description</b>	<b>IPC Findings</b>	<b>IPC Recommendations</b>
10	Part 1, 21-22	21:1-2	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
11	Part 1, 23	23:1-4	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
12	Part 1, 24-27	24:1, 25:1, 26:1, 27:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p23	17(1)(a) and (b) of FOIP do not apply	Release
13	Part 1, 28	28:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p23	17(1)(a) of FOIP and (b) does not apply	Release
14	Part 1, 29	29:1-5	17(1)(b)	Withheld in part	Email thread	17(1)(b) of FOIP does not apply	Release
15	Part 1, 30-32	30:1, 31:1, 32:1	17(1)(b)	Withheld in full	Attachment to p29	17(1)(b) of FOIP does not apply	Release
16	Part 1, 33-34	33:1, 34:1	22(a)	Withheld in full	Email thread Containing solicitor-client privilege	22(a) of FOIP applies, with the exception of headers, footers, subject lines and confidentiality	Withhold, with the exception of headers, footers, subject lines and confidentiality
17	Part 1, 35-40	35:1, 36:1, 37:1, 38:1, 39:1, 40:1	13(1)(b)	Withheld in full (except column titles on pages 35)	Attachment to p33	13(1)(b) of FOIP applies	Withhold
18	Part 1, 41-48	41:1-2, 42:1-2, 43:1-2, 44:1-2, 45:1-2, 46:1-2, 47:1-2, 48:1-2	22(a)	Withheld in full	Attachment to p33 Memo from legal counsel containing solicitor-client privilege	22(a) of FOIP properly applied, with the exception of headers, footers, subject lines and confidentiality	Withhold, with the exception of headers, footers, subject lines and confidentiality



Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
19	Part 1, 49-52	49:1-3, 50:1, 52:1-6, 52:8-9  50:2, 51:1, 52:7	29(1)  13(1)(b), 17(1)(b)	Withheld in full	Email thread	29(1) does not apply to redactions 49:1 – 49:3, 50:1, 52:1 – 52:6, 52:8, 52:9  13(1)(b) applies	Withhold redactions 50:2, 51:1 and 52:7. Release remaining portions.
21	Part 1, 75-78	75:1  75:2  75:3	22(a), 17(1)(a)  22(a), 17(1)(b)  17(1)(a), 17(1)(b)	Withheld in part	Email thread Containing solicitor-client privilege	22(a) of FOIP does not apply.  17(1)(a) and (b) of FOIP do not apply	Release
22	Part 1, 79	79:1	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP and do not apply	Release
24	Part 1, 81	81:1-3	13(1)(b)	Withheld in part	Email thread	13(1)(b) of FOIP does not apply	Release
26	Part 1, 83	83:1-4	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP and do not apply	Release
27	Part 1, 84-91	84:1, 85:1, 86:1, 87:1, 88:1, 89:1  90:1, 91:1	17(1)(a), 17(1)(b)  13(1)(b), 17(1)(a), 17(1)(b)	Withheld in full	Attachment to P83	17(1)(a) of FOIP applies  13(1)(b) of FOIP does not apply	Withhold
28	Part 1, 92	92:1-4	17(1)(a), 17(1)(b), 13(1)(b)	Withheld in full	Email thread	13(1)(b) of FOIP does not apply  17(1)(a) and (b) of FOIP do not apply	Release
29	Part 1, 93-95	93:1, 94:1, 95:1	13(1)(b), 17(1)(a), 17(1)(b)	Withheld in part	Attachment to p92	13(1)(b) of FOIP applies	Withhold

Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
30	Part 1, 96-101	96:1, 97:1, 98:1, 99:1, 100:1, 101:1	13(1)(b)	Withheld in full (except the table title on page 96)	Attachment to p92	13(1)(b) of FOIP applies	Withhold
31	Part 1, 102	102:1-3	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP does not apply	Release
32	Part 1, 103-111	103:1, 104:1, 105:1, 106:1, 107:1, 108:1, 109:1, 110:1, 111:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p102	17(1)(a) of FOIP applies	Withhold
33	Part 1, 112	112:1-4	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP does not apply	Release
34	Part 1, 113-121	113:1, 114:1, 115:1, 116:1, 117:1, 118:1, 119:1, 120:1, 121:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p102	17(1)(a) of FOIP applies	Withhold
35	Part 1, 122-123	122:1-4	13(1)(b), 17(1)(a), 17(1)(b)	Withheld in part	Email thread	13(1)(b), 17(1)(a) and (b) of FOIP do not apply	Release
36	Part 1, 124	124:1	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP does not apply	Release
39	Part 1, 129-132	129:1, 129:4, 129:9, 129:11, 129:12, 130:2, 130:9	17(1)(a), 17(1)(b), 13(1)(b)	Withheld in part	Email Thread	29(1) of FOIP does not apply to redactions 129:2-3, 129:5-8, 129:10-11, 129:13 130:1, 130:3, 130:5-8,	Release, with the exception of redactions 129:11 131:3 and 1331:6

Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
		129:2-3, 129:5-8, 129:10-11, 129:13 130:1, 130:3, 130:5-8, 130:10, 131:1-11  130:4  131:12-13	29(1)   13(1)(b)  17(1)(b)			130:10, 131:1, 2 and 4, 7-11  29(1) of FOIP applies to redactions 129:11 131:3 and 6  13(1)(b) of FOIP does not apply  17(1)(a) and (b) of FOIP do not apply	
40	Part 1, 133	133:1  133:2  133:3	29(1)  17(1)(b), 17(1)(a)  17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) do not apply  29(1) of FOIP applies to redaction 133:1	Withhold redaction 133:1.  Release remaining portions.
43	Part 1, 138	138:1-3	17(1)(a), 17(1)(b)	Withheld in part	Email	17(1)(a) and (b) of FOIP do not apply	Release
44	Part 1, 139- 141	139:1, 140:1, 141:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p138	17(1)(a) and (b) of FOIP do not apply	Release
45	Part 1, 142	142:1	29(1)	Withheld in part	Email Thread	29(1) of FOIP does not apply	Release
47	Part 1, 145- 146	145:1-2, 146:1	18(1)(b)(i)(ii)	Withheld in part	Maternal / New born Support Program	18(1)(b) of FOIP does not apply	Release
48	Part 1, 147- 148	147:1-5, 148:1-2	29(1)	Withheld in part	Email Thread	29(1) of FOIP applies	Withhold
49	Part 1, 149	149:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p147	17(1)(a) and (b) of FOIP do not apply	Release

<b>Record #</b>	<b>Page #</b>	<b>Severance #</b>	<b>FOIP Exemption(s) applied</b>	<b>Withheld in Full or in Part</b>	<b>Description</b>	<b>IPC Findings</b>	<b>IPC Recommendations</b>
50	Part 1, 150-151	150:1-6, 151:1	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
51	Part 1, 152	152:1	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
52	Part 1, 153-155	153:1, 154:1, 155:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p152	17(1)(a) and (b) of FOIP do not apply	Release
53	Part 1, 156	156:1-5	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
54	Part 1, 157-164	157:1, 158:1, 159:1, 160:1, 161:1, 162:1, 163:1, 164:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p156	17(1)(a) of FOIP applies	Withhold
55	Part 1, 165	165:1 165:2	17(1)(a), 17(1)(b) 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP does not apply	Release
56	Part 1, 166-174	166:1, 167:1, 168:1, 169:1, 170:1, 171:1, 172:1, 173:1, 174:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p165	17(1)(a) of FOIP applies	Withhold
58	Part 1, 176	176:1-2	29(1)	Withheld in part	Attachment to p175	29(1) of FOIP does not apply	Release
59	Part 1, 177-179	177:1-2, 178:1 177:3	17(1)(b) 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release

Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
		178:2, 179:1	17(1)(a), 17(1)(b)				
60	Part 1, 180	180:1-2	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
61	Part 1, 181-182	181:1-5	17(1)(a), 17(1)(b)	Withheld in part	Attachment to p180	17(1)(a) and (b) of FOIP do not apply	Release
62	Part 1, 183-185	183:1, 184:1, 185:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p181	17(1)(a) and (b) of FOIP do not apply	Release
63	Part 1, 186-187	186:1, 187:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p181	17(1)(a) and (b) of FOIP do not apply	Release
64	Part 1, 188	188:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p181	17(1)(a) and (b) of FOIP do not apply	Release
65	Part 1, 189-190	189:1-2, 190:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p181	17(1)(a) and (b) of FOIP do not apply	Release
66	Part 1, 191-196	191:1-3, 192:1, 192:3, 192:5, 193:2, 194:2, 194:4, 195:1, 195:3, 195:6  191:4, 192:2, 192:4, 193:1, 193:3, 194:1, 195:7  194:3, 194:5, 195:2, 195:4	17(1)(b), 17(1)(c), 18(1)(d)  17(1)(b), 17(1)(c), 18(1)(d), 18(1)(b)(i)(ii)  17(1)(b)	Withheld in part	Email thread	17(1)(b), (c) and 18(1)(d) of FOIP do not apply  29(1) of FOIP does not apply	Release

Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
		195:5, 195:8, 196:1	29(1)				
67	Part 1, 197	197:1-4	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
68	Part 1, 198- 202	198:1-2, 199:1, 200:1, 201:1, 202:1-2	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p197	17(1)(a) of FOIP applies	Withhold
69	Part 1, 203- 204	203:1-3	17(1)(a), 17(1)(b)	Withheld in part	Attachment to p197	17(1)(a) and (b) of FOIP does not apply	Release
71	Part 1, 209- 212	209:1-2, 210:1-4, 211:1-4,	17(1)(b)	Withheld in part	Email thread	17(1)(b) of FOIP does not apply	Release
72	Part 1, 213- 217	213:1, 214:1, 215:1, 216:1, 217:1	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
73	Part 1, 218- 221	218:1, 219:1, 220:1, 221:1	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
74	Part 1, 222- 229	222:1-3, 223:1-5, 224:1, 225:1, 226:1-4, 227:1, 228:1	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP does not apply.	Release
75	Part 1, 230- 231	230:1-3	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
76	Part 1, 232- 234	232:1, 233:1, 234:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p230	17(1)(a) of FOIP applies	Withhold
77	Part 1, 235- 238	235:1, 236:1, 237:1, 238:1	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release

Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
79	Part 1, 246-247	246:1	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
81	Part 1, 251-252	251:1-6, 252:1	17(1)(a), 17(1)(b)	Withheld in part	Attachment to p246	17(1)(a) and (b) of FOIP do not apply	Release
85	Part 1, 257-260	257:1-4, 258:1-2, 259:1-4	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
86	Part 1, 261-262	261:1-2, 262:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p257	17(1)(a) and (b) of FOIP do not apply	Release
87	Part 1, 263	263:1-3	17(1)(b), 17(1)(c), 18(1)(d)	Withheld in part	Email Thread	17(1)(b), (c) and 18(1)(d) of FOIP does not apply	Release
88	Part 1, 264-266	264:1-3, 265:1-4, 266:1-2  264:4	17(1)(b), 17(1)(c), 18(1)(d)  17(1)(b)	Withheld in part	Email thread	17(1)(b) of FOIP applies	Withhold
89	Part 1, 267	267:1-5	17(1)(b), 17(1)(c)	Withheld in part	Email Thread	17(1)(b) and (c) of FOIP does not apply	Release
90	Part 1, 268-269	268:1, 269:1	17(1)(b), 17(1)(c), 17(1)(a)	Withheld in full	Attachment to p267	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
91	Part 1, 270-271	270:1-2, 271:1-2	17(1)(b), 17(1)(c), 18(1)(d), 17(1)(a)	Withheld in full	Attachment to p267	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
92	Part 1, 272-273	272:1-4	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
93	Part 1,	274:1-2, 275:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p272	17(1)(a) and (b) of FOIP do not apply	Release

Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
	274-275						
94	Part 1, 276-277	276:1-3, 277:1	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) do not apply	Release
95	Part 1, 278-279	278:1-2, 279:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p276	17(1)(a) and (b) of FOIP do not apply	Release
96	Part 1, 280-281	280:1-4, 281:1-2	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP does not apply	Release
97	Part 1, 282-283	282:1, 283:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p280	17(1)(a) and (b) of FOIP do not apply	Release
98	Part 1, 284-285	284:1-4, 285:1-2	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
99	Part 1, 286-287	286:1-2, 287:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p284	17(1)(a) and (b) of FOIP do not apply	Release
100	Part 2, 1-9	1:3, 2:1 1:1-2, 2:2-3, 3:1-4, 4:1, 5:1-2, 6:1-3, 7:1, 8:1-2 7:2	22(a) 17(1)(a), 17(1)(b) 17(1)(a), 17(1)(b), 13(1)(b)	Withheld in part	Email Thread containing solicitor-client privilege discussing the attachment	22(a) of FOIP does not apply 13(1)(b) of FOIP does not apply 17(1)(a) and (b) of FOIP do not apply	Release
101	Part 2, 10-11	10:1, 11:1	22(a)	Withheld in full	Attachment to p1	22(a) of FOIP applies, with the exception of headers, footers, subject lines and confidentiality	Withhold, with the exception of headers, footers, subject lines and confidentiality
102	Part 2,	12:1-3, 13:1-2, 14:1-3,	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	13(1)(b) of FOIP does not apply	Release



Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
	12-18	15:1, 16:1-3, 17:1-3  16:4	17(1)(a), 17(1)(b), 13(1)(b)			17(1)(a) and (b) of FOIP do not apply	
104	Part 2, 22-26	22:1-3, 23:1, 24:1, 25:1	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
105	Part 2, 27-28	27:1-3	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP does not apply	Release
106	Part 2, 29-30	29:1-2, 30:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p27	17(1)(a) and (b) of FOIP do not apply	Release
107	Part 2, 31-32	31:1-4	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
108	Part 2, 33-34	33:1-2, 34:1-2	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p31	17(1)(a) and (b) of FOIP do not apply	Release
109	Part 2, 35-36	35:1, 35:3-4, 36:1-2  35:2	17(1)(a), 17(1)(b), 18(1)(d) 17(1)(c), 18(1)(d), 18(1)(b)	Withheld in part	Email thread	17(1)(a), (b), (c), 18(1)(b) and (d) of FOIP do not apply	Release
110	Part 2, 37-39	37:1, 38:1, 39:1	17(1)(c), 18(1)(b), 18(1)(d)	Withheld in full	Attachment to p35	17(1)(c), 18(1)(b) and (d) of FOIP do not apply	Release
111	Part 2, 40-41	40:1-4, 41:1-2	17(1)(a), 17(1)(b), 16(1)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
112	Part 2, 42-43	42:1-2, 43:1	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Attachment to p 40	17(1)(a) and (b) of FOIP do not apply	Withhold

Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
						16(1) of FOIP applies	
113	Part 2, 44-46	44:1-5, 45:1-4, 46:1	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
114	Part 2, 47-49	47:1-3, 48:2-3  48:1	17(1)(a), 17(1)(b), 16(1)  17(1)(c), 18(1)(d)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies to redaction 47:1-3 and 48:2-3  17(1)(c) and 18(1)(d) of FOIP does not apply to redaction 48:1	Withhold, with the exception of redaction 48:1
115	Part 2, 50-54	50:1  51:1, 52:1, 53:1, 54:1	17(1)(a), 17(1)(b), 16(1)  29(1), 16(1)	Withheld in full	Attachment to p47	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
116	Part 2, 55-56	55:1-2, 56:1	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Attachment to p47	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
117	Part 2, 57-59	57:1-5, 58:1-4, 59:1	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP does not apply	Release
118	Part 2, 60-62	60:1-3, 61:1-2	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
119	Part 2, 63-64	63:1-3, 64:1  63:4, 64:2	16(1)  17(1)(a), 17(1)(b), 16(1)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply.  16(1) of FOIP applies	Withhold

Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
120	Part 2, 65-66	65:1-2, 66:1-2	17(1)(a), 17(1)(b)	Withheld in part	Attachment to p63	17(1)(a) and (b) of FOIP do not apply	Release
122	Part 2, 68-69	68:1-2, 69:1	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Attachment to p63	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
123	Part 2, 70	70:1	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Attachment to p63	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
124	Part 2, 71-72	71:1-4	17(1)(a), 17(1)(b), 16(1)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
125	Part 2, 73	73:1	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Attachment to p71	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
126	Part 2, 74-78	74:1-4, 75:1, 76:1-2, 77:1, 76:3  76:4  77:2, 78:1	17(1)(a), 17(1)(b), 18(1)(d), 17(1)(a), 17(1)(b), 16(1)  17(1)(a), 17(1)(b), 18(1)(d), 16(1)  17(1)(a), 17(1)(b)	Withheld in part	Email thread	16(1) of FOIP applies to all redactions	Withhold
127	Part 2, 79	79:1-3	17(1)(a), 17(1)(b), 18(1)(d), 16(1)	Withheld in part	Attachment to P74	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold

Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
128	Part 2, 80-81	80:1, 81:1	17(1)(a), 17(1)(b), 18(1)(d), 29(1), 16(1)	Withheld in full	Attachment to P79	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
129	Part 2, 82-83	82:1, 83:1	17(1)(a), 17(1)(b), 18(1)(d), 29(1), 16(1)	Withheld in full	Attachment to P79	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
130	Part 2, 84	84:1	17(1)(a), 17(1)(b), 18(1)(d), 29(1), 16(1)	Withheld in full	Attachment to P79	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
131	Part 2, 85-87	85:1-4, 86:1-4	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) do not apply	Release
132	Part 2, 88	88:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to P85	17(1)(a) and (b) of FOIP do not apply	Release
133	Part 2, 89-90	89:1-4	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
134	Part 2, 91	91:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to P89	17(1)(a) and (b) of FOIP do not apply	Release
135	Part 2, 92-93	92:1-2, 93:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to P89	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
136	Part 2, 94-95	94:1-4	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) does not apply	Release
137	Part 2, 96	96:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to P94	17(1)(a) and (b) of FOIP do not apply	Release

Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
138	Part 2, 97-98	97:1-2, 98:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to P94	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
139	Part 2, 99-100	99:1-3, 100:1-2  99:4	17(1)(a), 17(1)(b), 16(1)  17(1)(a), 17(1)(b), 22(a), 16(1)	Withheld in part	Email Thread Containing solicitor-client privilege;	22(a) of FOIP does not apply.  17(1)(a) and (b) of FOIP to not apply  16(1) of FOIP applies to 99:1-3, 100:1-2	Withhold, with the exception of redaction 99:4
140	Part 2, 101-102	101:1-2, 102:1-2	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Attachment to P99	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
141	Part 2, 103	103:1	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Attachment to P99	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
142	Part 2, 104-105	104:1-3  104:4	17(1)(a), 17(1)(b), 16(1)  17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
143	Part 2, 106	106:1	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Attachment to p104	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
144	Part 2, 107-108	107:1-2, 108:1-2	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Attachment to p104	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold

Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
145	Part 2, 109-110	109:1  109:2, 110:1	17(1)(a), 17(1)(b), 16(1)  17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies to all redactions	Withhold
146	Part 2, 111-112	111:1-2, 112:1	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Attachment to p109	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
147	Part 2, 113-114	113:1-3, 114:1-2	17(1)(a), 17(1)(b), 16(1)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
148	Part 2, 115-116	115:1-2, 116:1	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Attachment to p113	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
149	Part 2, 117-118	117:1-5, 118:1	17(1)(a), 17(1)(b), 16(1)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
150	Part 2, 119-120	119:1-2, 120:1	17(1)(a), 17(1)(b), 16(1)	Withheld in part	Attachment to p117	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
151	Part 2, 121-122	121:1-3, 121:5-6  121:4	17(1)(a), 17(1)(b), 16(1)  17(1)(a), 17(1)(b), 18(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies to all redactions	Withhold
152	Part 2,	123:1, 124:1, 125:1,	17(1)(a), 17(1)(b), 17(1)(c),	Withheld in full	Attachment to p121	17(1)(a) and (b) of FOIP do not apply	Withhold

Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
	123-143	126:1, 127:1  128:1, 129:1, 130:1  131:1, 132:1, 133:1, 134:1, 135:1, 136:1, 137:1, 138:1, 139:1, 140:1, 141:1, 142:1, 143:1	18(1)(b)(i)(ii), 18(1)(d), 16(1)  17(1)(a), 17(1)(b), 18(1)(b), 16(1)  16(1)			16(1) of FOIP applies	
153	Part 2, 144	144:1	16(1)	Withheld in full	Attachment to p121	16(1) of FOIP applies	Withhold
154	Part 2, 145	145:1-4	17(1)(a), 17(1)(b), 16(1)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
155	Part 2, 146-147	146:1-2, 147:1	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Attachment to p145	17(1)(a) and (b) of FOIP do not apply.  16(1) of FOIP applies	Withhold
156	Part 2, 148-169	148:1, 149:1-2	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
158	Part 2, 173-179	173:1-2, 174:1, 175:1, 176:1,	16(1)	Withheld in full	Email thread	16(1) of FOIP applies	Withhold

Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
		177:1, 178:1, 179:1					
159	Part 2, 180-187	180:1-4, 181:1, 182:1-4, 183:1-4, 184:1  186:1-3, 187:1	17(1)(a), 17(1)(b)  29(1)		Email thread	17(1)(a), (b) and 29(1) of FOIP do not apply.	Release
160	Part 2, 188	188:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p187	17(1)(a) and (b) of FOIP do not apply	Release
161	Part 2, 189-193	190:1, 191:1, 192:1-3	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
162	Part 2, 194-252	196:1, 202:1, 204:1, 205:1, 222:1, 223:1, 224:1, 225:1, 226:1, 242:1, 243:1, 245:1	17(1)(a), 17(1)(b)	Withheld in part	attachment to p189	17(1)(a) and (b) of FOIP do not apply	Release
163	Part 2, 253-255	253:1-4, 254:7-8  254:1-6, 254:9, 255:1	17(1)(a), 17(1)(b), 13(1)(b)  29(1)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply  13(1)(b) of FOIP does not apply  29(1) of FOIP does not apply	Release
164	Part 2, 256-270	256:1, 257:1, 258:1, 259:1, 260:1, 261:1, 262:1, 263:1,	13(1)(b)	Withheld in full	Attachment to p 253	13(1)(b) of FOIP applies	Withhold



Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
		264:1, 265:1, 266:1, 267:1, 268:1, 269:1, 270:1					
165	Part 2, 271-274	271:1-3, 272:1	16(1)	Withheld in part	Email thread	16(1) of FOIP applies	Withhold
166	Part 2, 275-276	275:1, 276:1	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Attachment to p. 271	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
167	Part 2, 277-281	277:1-2, 278:1-2, 279:1, 280:1-2, 281:1	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Attachment to p. 271	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
168	Part 2, 282-285	282:1, 282:3, 283:2, 284:2, 285:1  282:2, 282:4, 283:1, 283:3, 284:1	17(1)(a), 17(1)(b), 16(1)  16(1), 17(1)(a), 17(1)(b), 17(1)(c), 18(1)(d)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies to all redactions	Withhold
169	Part 2, 286	286:1-3	16(1), 17(1)(a), 17(1)(b), 17(1)(c), 18(1)(d)	Withheld in part	Attachment to p282	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
170	Part 2, 287-288	287:1, 288:1	16(1), 17(1)(a), 17(1)(b), 17(1)(c), 18(1)(d)	Withheld in full	Attachment to p286	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold

Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
171	Part 2, 289	289:1	16(1), 17(1)(a), 17(1)(b), 17(1)(c), 18(1)(d)	Withheld in full	Attachment to p286	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
172	Part 2, 290-291	290:1-3, 291:1  290:4, 291:2	17(1)(a), 17(1)(b), 16(1)  17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
173	Part 2, 292-293	292:1, 293:1	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Attachment to p290	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
174	Part 2, 294-298	294:1-2, 295:1-2, 296:1, 297:1-2, 298:1	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Attachment to p290	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
175	Part 2, 299-300	299:1-3, 300:1-2  299:4	17(1)(a), 17(1)(b), 16(1)  17(1)(a), 17(1)(b)	Withheld in part	Email Thread	16(1) of FOIP applies to all redactions  17(1)(a) and (b) of FOIP do not apply	Withhold
176	Part 2, 301-306	301:1, 302:1, 303:1, 304:1, 305:1, 306:1	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Attachment to 299	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
177	Part 2, 307-308	307:1-4, 308:1	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
178	Part 2, 309-313	309:1, 310:1, 311:1, 312:1, 313:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p307	17(1)(a) and (b) of FOIP do not apply	Release

<b>Record #</b>	<b>Page #</b>	<b>Severance #</b>	<b>FOIP Exemption(s) applied</b>	<b>Withheld in Full or in Part</b>	<b>Description</b>	<b>IPC Findings</b>	<b>IPC Recommendations</b>
179	Part 2, 314-315	314:1, 315:1	17(1)(a), 17(1)(b), 17(1)(c), 18(1)(d)	Withheld in full	Attachment to p307	17(1)(a), (b), (c) and 18(1)(d) of FOIP do not apply	Release
180	Part 2, 316-319	316:1, 317:1, 318:1, 319:1	17(1)(a), 17(1)(b), 17(1)(c), 18(1)(d)	Withhold in full	Attachment to p307	17(1)(a), (b), (c) and 18(1)(d) of FOIP do not apply	Release
181	Part 2, 320-321	320:1-4, 321:1	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
182	Part 2, 322-341	322:1, 323:1, 324:1, 325:1, 326:1, 327:1, 328:1, 329:1, 330:1, 331:1, 332:1, 333:1, 334:1, 335:1, 336:1, 337:1, 338:1, 339:1, 340:1, 341:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p320	17(1)(a) and (b) of FOIP do not apply	Release
183	Part 2, 342-345	342:1-3, 343:1-4, 344:1-3	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
184	Part 2, 346-350	346:1, 347:1, 348:1, 349:1, 350:1	22(a)	Withheld in full	Email Thread Containing solicitor-client privilege on the attachment	22(a) of FOIP applies, with the exception of headers, footers, subject lines and confidentiality statements in any emails.	Withhold, with the exception of headers, footers, subject lines and confidentiality statements in any emails.

Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
185	Part 2, 351-662	351:1-662:1	22(a)	Withheld in full	Attachment to p346	22(a) of FOIP applies, with the exception of headers, footers, subject lines and confidentiality	Withhold, with the exception of headers, footers, subject lines and confidentiality
186	Part 2, 663-666	663:1-4, 664:1-3, 665:1-2	17(1)(a), 17(1)(b)	Withheld in full	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
187	Part 2, 667-669	667:1-2, 668:1, 669:1-2	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p664	17(1)(a) and (b) of FOIP do not apply	Release
188	Part 2, 670-692	670:1-692:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p664	17(1)(a) and (b) of FOIP do not apply	Release
189	Part 3, 1-6	1:1-3, 2:1, 3:1, 4:1-2, 5:1-2, 6:1-2	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
190	Part 3, 7-12	7:1-3, 8:1-2, 9:1-4, 10:1-4, 11:1, 12:1	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
191	Part 3, 13-19	13:1-4, 14:1-4, 15:1-3, 16:1-2  17:1, 18:1, 19:1	17(1)(a), 17(1)(b)  17(1)(a), 17(1)(b), 22(a)	Pages 13 to 16 withheld in part  Pages 17 to 19 withheld in full	Email thread Containing solicitor-client privilege	22(a) of FOIP does not apply  17(1)(a) and (b) of FOIP do not apply	Release
192	Part 3, 20-22	20:1-2, 21:1, 22:1-2	22(a), 17(1)(a), 17(1)(b)	Withheld in full	Attachment to p13	Social Services is no longer applying 22(a) of FOIP	Release
193	Part 3, 23-26	23:1-2, 24:1-3, 25:1-2, 26:1-2	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
194	Part 3, 27-30	27:1-2, 28:1, 29:1	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release

Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
195	Part 3, 31-37	31:1, 32:1, 33:1, 34:1, 35:1, 36:1, 37:1	17(1)(a), 17(1)(b), 22(a)	Withheld in full	Email thread Containing solicitor-client privilege	22(a) of FOIP applies, with the exception of headers, footers, subject lines and confidentiality	Withhold, with the exception of headers, footers, subject lines and confidentiality
196	Part 3, 38-40	38:1-4, 39:1-2, 40:1,	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
197	Part 3, 41	41:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p40	17(1)(a) and (b) of FOIP do not apply	Release
198	Part 3, 42-45	42:1	17(1)(a), 17(1)(b), 22(a)	Withheld in part	Email thread Containing solicitor-client privilege	22(a) of FOIP does not apply	Release
199	Part 3, 46-49	46:1-4, 47:1-4, 48:1-2, 49:1-2	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
200	Part 3, 50-51	50:1-4, 51:1-2	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
202	Part 3, 54-58	54:1-5, 55:1-8, 56:1-5, 57:1 58:1	17(1)(a), 17(1)(b) 29(1)	Withheld in part	Email thread	17(1)(a), (b) and 29(1) of FOIP does not apply	Release
203	Part 3, 59	59:1-4	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
205	Part 3, 65	65:1	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Email thread	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
206	Part 3, 66-67	66:1, 67:1	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Attachment to p65	17(1)(a) and (b) of FOIP do not apply	Withhold

Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
						16(1) of FOIP applies	
207	Part 3, 68	68:1	22(a)	Withheld in full	Email thread Containing solicitor-client privilege	22(a) of FOIP does not apply	Release
208	Part 3, 69-78	69:1, 70:1, 71:1, 72:1, 73:1, 74:1, 75:1, 76:1, 77:1, 78:1	22(a)	Withheld in full	Attachment to p68 Containing solicitor-client privilege	22(a) of FOIP applies, with the exception of headers, footers, subject lines and confidentiality statements in any emails.	Withhold, with the exception of headers, footers, subject lines and confidentiality statements in any emails.
209	Part 3, 79-80	79:1-5, 80:1	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
210	Part 3, 81-83	81:1-4, 82:1,	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
211	Part 3, 84-85	84:1-2, 85:1	17(1)(a), 17(1)(b)	Withheld in full	BN	17(1)(a) and (b) of FOIP do not apply	Release
212	Part 3, 86-87	86:1-2, 87:1	17(1)(a), 17(1)(b)	Withheld in full	BN	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
213	Part 3, 88-89	88:1-2, 89:1	17(1)(a), 17(1)(b)	Withheld in full	BN	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
214	Part 3, 90-91	90:1-2, 91:1	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release

Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
215	Part 3, 92-93	92:1-3	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
216	Part 3, 94-95	94:1-4	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
217	Part 3, 96	96:1-2	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
218	Part 3, 97	97:1-2	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
221	Part 3, 100-101	100:1, 101:1	17(1)(a), 17(1)(b), 22(a)	Withheld in full	Email thread Containing solicitor-client privilege	22(a) of FOIP applies, with the exception of headers, footers, subject lines and confidentiality statements in any emails.	Withhold, with the exception of headers, footers, subject lines and confidentiality statements in any emails.
222	Part 3, 102-104	102:1, 103:1, 104:1	17(1)(a), 17(1)(b), 22(a)	Withheld in full	Email thread Containing solicitor-client privilege	22(a) of FOIP applies, with the exception of headers, footers, subject lines and confidentiality statements in any emails.	Withhold, with the exception of the portion that is recommended to be release in record 218, with the exception of headers, footers, subject lines and confidentiality statements in any emails.
223	Part 3, 105-106	105:1-6	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
224	Part 3, 107-108	107:1, 108:1	17(1)(a), 17(1)(b), 22(a)	Withheld in full	Email Thread Containing solicitor-client privilege	22(a) of FOIP does not apply	Release
225	Part 3, 109-110	109:1, 110:1	17(1)(a), 17(1)(b), 22(a)	Withheld in full	Attachment to p107	22(a) of FOIP applies, with	Withhold, with the exception of headers,

Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
	109-118	111:1, 112:1, 113:1, 114:1, 115:1, 116:1, 117:1, 118:1			Containing solicitor-client privilege	the exception of headers, footers, subject lines and confidentiality statements in any emails.	footers, subject lines and confidentiality statements in any emails.
226	Part 3, 119-121	119:1-5, 120:1-4	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
227	Part 3, 122-124	122:1  122:2, 123:1, 124:1	17(1)(a), 17(1)(b)  29(1)	Withheld in full	Attachment to p119	17(1)(a) and (b) of FOIP do not apply  29(1) of FOIP applies to 122:2, 123:1, 124:1	Withhold, with the exception of redaction 122:1
228	Part 3, 125	125:1  125:2   125:3	16(1)  17(1)(a), 17(1)(b), 16(1)  17(1)(a), 17(1)(b)		Email Thread	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
229	Part 3, 126-127	126:1-2, 127:1	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Attachment to p125	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
230	Part 3, 128	128:1	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Attachment to p125	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
231	Part 3, 129-131	129:1-3, 130:1-2, 131:1	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
234	Part 3, 135-137	135:1-7, 136:1-2	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release



Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
236	Part 3, 140	140:1-3	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
237	Part 3, 141	141:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p140	17(1)(a) and (b) of FOIP do not apply	Release
238	Part 3, 142	142:1-2	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
239	Part 3, 143	143:4	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
240	Part 3, 144-146	144:1-4, 145:1-5, 146:1-2	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
241	Part 3, 147-153	147:1, 148:1, 149:1, 150:1, 151:1, 152:1, 153:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p144	17(1)(a) and (b) of FOIP do not apply	Release
242	Part 3, 155	155:1-2	17(1)(a), 17(1)(b)	Withheld in part	Email	17(1)(a) and (b) of FOIP do not apply	Release
243	Part 3, 156	156:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p155	17(1)(a) and (b) of FOIP do not apply	Release
245	Part 3, 157-159	157:1-5, 158:1-4, 159:1	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
246	Part 3, 160-161	160:1-4	29(1)	Withheld in part	Email thread	29(1) of FOIP applies	Withhold
247	Part 3, 162-164	162:1-4, 163:1-2	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
248	Part 3, 165-167	165:1-4, 166:1-5	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
249	Part 3,	168:1-5	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release

Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
	168-169						
250	Part 3, 170-172	170:1-4, 171:1-5, 172:1	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
251	Part 3, 173-174	173:1-7 173:8, 174:1	17(1)(a), 17(1)(b)  17(1)(a), 17(1)(b), 22(a)	Page 173 withheld in part  Page 174 withheld in full	Email Thread Containing solicitor-client privilege	17(1)(a) and (b) of FOIP do not apply  22(a) of FOIP applies to redaction 173:8 and 174:1, with the exception of headers, footers, subject lines and confidentiality	Withhold redaction 173:8 and 174, with the exception of headers, footers, subject lines and confidentiality  Release redactions 173:1-7
252	Part 3, 175-176	175:1-7  175:8, 176:1	17(1)(a), 17(1)(b)  17(1)(a), 17(1)(b), 22(a)	Page 175 withheld in part  Page 176 withheld in full	Email Thread Containing solicitor-client privilege	17(1)(a) and (b) of FOIP do not apply  22(a) of FOIP applies to 175:8 and pages 176, with the exception of headers, footers, subject lines and confidentiality	Withhold redaction 175:8 and page 176, with the exception of headers, footers, subject lines and confidentiality  Release redaction 175:1-7
253	Part 3, 177-179	177:1-8, 178:1-6  179:1	17(1)(a), 17(1)(b)  17(1)(a), 17(1)(b), 22(a)	Pages 177 and 178 withheld in part  Pages 179 withheld in full	Email Thread Containing solicitor-client privilege	17(1)(a) and (b) of FOIP do not apply  22(a) of FOIP applies to page 179, with the exception of headers, footers, subject lines and confidentiality	Withhold redaction 179:1 with the exception of headers, footers, subject lines and confidentiality statement  Release remaining portions
254	Part 3, 180-181	180:1, 180:3, 180:5-6, 181:2-3	17(1)(a), 17(1)(b), 16(1)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Withhold

Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
		180:2, 180:4, 180:7, 181:1	17(1)(a), 17(1)(b)			16(1) of FOIP applies to all redactions	
255	Part 3, 182	182:1	29(1)	Withheld in full	Birth alert chart with names	29(1) of FOIP applies	Withhold
256	Part 3, 183-184	183:1-5, 184:1	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
257	Part 3, 185	185:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p183	17(1)(a) and (b) of FOIP do not apply	Release
258	Part 3, 186-188	186:1-3, 187:1-3, 188:1-2	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
259	Part 3, 189-191	189:1-6, 190:1-4, 191:1	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
260	Part 3, 192	192:1-3	29(1)	Withheld in part	Email Thread	29(1) of FOIP does not apply	Release
261	Part 3, 193-194	193:1-8, 194:1-3	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
262	Part 3, 195-197	195:1-3, 196:1-2, 197:1-2	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
263	Part 3, 198-200	198:1-6, 199:1-6,	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
264	Part 3, 201-204	201:1-4, 202:1-5, 203:1	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
265	Part 3, 205-207	205:1-4, 206:1-2	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release

<b>Record #</b>	<b>Page #</b>	<b>Severance #</b>	<b>FOIP Exemption(s) applied</b>	<b>Withheld in Full or in Part</b>	<b>Description</b>	<b>IPC Findings</b>	<b>IPC Recommendations</b>
266	Part 3, 208-209	208:1	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
267	Part 3, 210	210:1-3	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
268	Part 3, 211-212	211:1-7, 212:1-4	29(1)	Withheld in part	Email Thread	29(1) of FOIP does not apply	Release
269	Part 4, 1	1:1	17(1)(a), 17(1)(b)	Withheld in part	Memo – policy update	17(1)(a) and (b) of FOIP do not apply	Release
270	Part 4, 3	3:1	17(1)(a), 17(1)(b)	Withheld in part	Memo – new policy	17(1)(a) and (b) of FOIP do not apply	Release
271	Part 4, 5-6	5:1	17(1)(a), 17(1)(b)	Withheld in part	Memo – policy update	17(1)(a) and (b) of FOIP do not apply	Release
277	Part 4, 24-26	24:1, 25:1, 26:1	17(1)(a), 17(1)(b)	Withheld in full	Media Briefing advice	17(1)(a) of FOIP applies	Withhold
278	Part 4, 27	27:1	17(1)(a), 17(1)(b)	Withheld in part	Memo	17(1)(a) and (b) of FOIP do not apply	Release
280	Part 4, 30-69	30:1, 31:1, 32:1, 33:1, 34:1, 35:1, 36:1, 37:1, 38:1, 39:1, 40:1, 41:1, 42:1, 43:1, 44:1, 45:1, 46:1, 47:1, 48:1, 49:1, 50:1, 51:1, 52:1, 53:1, 54:1, 55:1, 56:1, 57:1, 58:1, 59:1, 60:1, 61:1, 62:1, 63:1, 64:1, 65:1,	17(1)(a), 17(1)(b)	Withheld in full	DRAFT Family Centred Manual	17(1)(a) and (b) of FOIP do not apply	Release

Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
		66:1, 67:1, 68:1, 69:1					
286	Part 4, 78	78:1	17(1)(a), 17(1)(b)	Withheld in part	Memo	17(1)(a) and (b) of FOIP do not apply	Release
287	Part 4, 80-100	80:1, 81:1, 82:1, 83:1, 84:1, 85:1, 86:1, 87:1, 88:1, 89:1, 90:1, 91:1, 92:1, 93:1, 94:1, 95:1, 96:1, 97:1, 98:1, 99:1, 100:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to 78	17(1)(a) and (b) of FOIP do not apply	Release
288	Part 4, 101	101:1-4	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
289	Part 4, 102-103	102:1, 103:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to 101	17(1)(a) and (b) of FOIP do not apply	Release
290	Part 4, 104	104:1-2  104:3	17(1)(a), 17(1)(b), 16(1), 29(1)  17(1)(a), 17(1)(b), 16(1)	Withheld in part	Email	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
291	Part 4, 105-107	105:1, 106:1  107:1	17(1)(a), 17(1)(b), 16(1)  29(1)	Withheld in full	Attachment to 104	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies to all redactions	Withhold
292	Part 4, 108-109	108:1-9, 109:1	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
293	Part 4, 110-111	110:1, 111:1	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Attachment to p108	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold

Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
294	Part 4, 112-115	112:1, 113:1, 114:1, 115:1	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Attachment to p108	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
295	Part 4, 116-124	116:1, 117:1, 118:1, 119:1, 120:1, 121:1, 122:1, 123:1, 124:1	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Attachment to p108	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
296	Part 4, 125-126	126:1  126:2	17(1)(a), 17(1)(b)  29(1)	Withheld in part	Email Thread	17(1)(a), (b) and 29(1) of FOIP do not apply	Release
297	Part 4, 127-128	127:1-4, 128:1-2	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
298	Part 4, 129	129:1-3  129:4	29(1)  17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
299	Part 4, 130	130:1-3	29(1)	Withheld in part	Attachment to p634	29(1) of FOIP applies	Withhold
300	Part 4, 131	131:1-3	17(1)(a), 17(1)(b)	Withheld in part	Email	17(1)(a) and (b) of FOIP do not apply	Release
301	Part 4, 132-133	132:1, 133:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p131	17(1)(a) and (b) of FOIP do not apply	Release
302	Part 4, 134	134:1-3	17(1)(a), 17(1)(b)	Withheld in part	Email	17(1)(a) and (b) of FOIP do not apply	Release
303	Part 4, 135-136	135:1-2	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
304	Part 4, 137-139	137:1, 138:1, 139:1	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Email Thread	17(1)(a) and (b) of FOIP do not apply	Withhold

Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
	137-139					16(1) of FOIP applies	
305	Part 4, 140-142	140:1, 141:1, 142:1	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Attachment to p137	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
306	Part 4, 143-144	143:1-2  143:3	17(1)(a), 17(1)(b)  29(1)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply  29(1) of FOIP does not apply	Release
307	Part 4, 145-146	145:1-3  146:1	17(1)(a), 17(1)(b), 13(1)(b)  17(1)(a), 17(1)(b)	Withheld in part	Email Thread	13(1)(b), 17(1)(a) and (b) of FOIP do not apply	Release
308	Part 4, 147	147:1-4	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
309	Part 4, 148-149	148:1  149:1	17(1)(a), 17(1)(b), 16(1)  29(1)	Withheld in full	Email Thread	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies to 148:1  29(1) of FOIP does not apply	Withhold 148:1  Release 149:1
310	Part 4, 150-151	150:1, 151:1	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Attachment to p148	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
311	Part 4, 152	152:1-4	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
312	Part 4, 153	153:1-3	17(1)(a), 17(1)(b), 16(1)	Withheld in part	Email	17(1)(a) and (b) of FOIP do not apply	Withhold

Record #	Page #	Severance #	FOIP Exemption(s) applied	Withheld in Full or in Part	Description	IPC Findings	IPC Recommendations
						16(1) of FOIP applies	
313	Part 4, 154-155	154:1, 155:1	17(1)(a), 17(1)(b), 16(1)	Withheld in full	Attachment to p153	17(1)(a) and (b) of FOIP do not apply  16(1) of FOIP applies	Withhold
314	Part 4, 156	156:1	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
315	Part 4, 157-159	157:1, 158:1 158:2-4, 159:1	17(1)(a), 17(1)(b)  29(1)	Withheld in part	Email Thread	29(1) of FOIP does not apply  17(1)(a) and (b) of FOIP do not apply	Release
316	Part 4, 160-162	160:1, 161:1, 162:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p157	17(1)(a) and (b) of FOIP do not apply	Release
317	Part 4, 163-165	163:1-3, 164:1, 165:1	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
318	Part 4, 166-168	166:1 166:2, 167:1-2, 168:1-2	17(1)(a), 17(1)(b)  29(1)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply  29(1) of FOIP does not apply	Release
319	Part 4, 169	169:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p671	17(1)(a) and (b) of FOIP do not apply	Release
320	Part 4, 170	170:1-3	17(1)(a), 17(1)(b)	Withheld in part	Email Thread	17(1)(a) and (b) of FOIP do not apply	Release
321	Part 4, 171-177	171:1, 172:1, 173:1, 174:1, 175:1, 176:2, 177:1	17(1)(a), 17(1)(b)	Withheld in full	Attachment to p170	17(1)(a) and (b) of FOIP do not apply	Release



<b>Record #</b>	<b>Page #</b>	<b>Severance #</b>	<b>FOIP Exemption(s) applied</b>	<b>Withheld in Full or in Part</b>	<b>Description</b>	<b>IPC Findings</b>	<b>IPC Recommendations</b>
322	Part 5, 1-2	1:1, 2:2	22(a)	Withheld in full	Email thread containing solicitor-client privilege	22(a) of FOIP applies, with the exception of headers, footers, subject lines and confidentiality statements in any emails.	Withhold, with the exception of headers, footers, subject lines and confidentiality statements in any emails.
323	Part 5, 3-4	3:1, 4:1	22(a)	Withheld in full	Email thread containing solicitor-client privilege	22(a) of FOIP applies, with the exception of headers, footers, subject lines and confidentiality statements	Withhold, with the exception of headers, footers, subject lines and confidentiality statements in any emails.
324	Part 5, 5-8	5:1-3, 6:1-4, 7:1-3, 8:1-3	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release
325	Part 5, 9-10	9:1-4, 10:1-8	17(1)(a), 17(1)(b)	Withheld in part	Email thread	17(1)(a) and (b) of FOIP do not apply	Release