



Office of the
Saskatchewan Information
and Privacy Commissioner

REVIEW REPORT 110-2024

Ministry of Corrections, Policing and Public Safety

November 13, 2024

Summary:

The Applicant made an access to information request to the Ministry of Corrections, Policing and Public Safety (Corrections) for records related to an incident in which the Applicant was involved while incarcerated. Corrections released records to the Applicant, withholding pages in part or in full pursuant to subsections 2(2)(c), 13(1)(a) and 29(1) of *The Freedom of Information and Protection of Privacy Act* (FOIP) and to a statement on one page pursuant to subsection 27(1) of *The Health Information Protection Act* (HIPA). The Applicant asked the Commissioner to review Corrections' exemptions, as well as its search efforts. The A/Commissioner found it would be an absurd result to withhold the information withheld in part pursuant to subsection 29(1) of FOIP and subsection 27(1) of HIPA and recommended that Corrections release the information to the Applicant within 30 days of the issuance of this Report. The A/Commissioner also found that Corrections properly applied subsection 29(1) of FOIP to a couple of pages withheld in full, except for portions that identify these pages as "Log Detail Reports." The A/Commissioner recommended that Corrections continue to withhold the personal information on these two pages pursuant to subsection 29(1) of FOIP, and to release the remainder to the Applicant within 30 days of the issuance of this Report. Finally, the A/Commissioner found Corrections' search was not reasonable. As such, the A/Commissioner recommended that within seven days of the issuance of this Report, Corrections conduct a further search for the photos that are mentioned in the reports and for records related to the incident that would have been created in the month of September 2023 and, if located, release them to the Applicant subject to any exemptions found to apply. In the absence of finding further records, then Corrections should provide the Applicant and the A/Commissioner's office with its reasons for why these records were not located.

I BACKGROUND

[1] In this matter, the Applicant is represented by a lawyer. On March 7, 2024, the Ministry of Corrections, Policing and Public Safety (Corrections) received the following access to information request from the Applicant’s lawyer for the following for the period “January 2023 – Present”:

All correctional records
All medical correctional records

[2] In its section 7 decision letter dated April 8, 2024, Corrections stated that it was withholding records in part pursuant to subsection 29(1) of *The Freedom of Information and Protection of Privacy Act* (FOIP) and subsection 27(1) of *The Health Information Protection Act* (HIPA). Corrections added it was also withholding records in full pursuant to subsections 2(2)(c), 13(1)(a) and 29(1) of FOIP.

[3] On April 15, 2024, the Applicant’s lawyer asked my office to review Corrections’ decision, adding that there were no “medical or correctional records disclosed regarding the accident [involving the Applicant] or for the month of September.”

[4] On May 9, 2024, Corrections advised my office that the Royal Canadian Mounted Police consented to the release of information that Corrections had withheld pursuant to subsection 13(1)(a) of FOIP. Accordingly, Corrections withdrew its reliance on subsection 13(1)(a) of FOIP and disclosed additional records to the Applicant. Corrections also stated it was releasing copies of the Court records (and so subsection 2(2)(c) of FOIP was no longer relevant). Corrections further consented to sharing the following information with the Applicant regarding its search:

In this matter, CP 309-23P (IPC 110-2024), the Ministry released the records from the date it received CP 190-23P (October 24, 2023) to the date it received CP 309-23P (March 7, 2024) instead of from June 2023 to March 7, 2024. The reason why is because a portion of the timeline overlapped with the Applicant’s previous request (June 2023 – October 23, 2023) and the Applicant had already been provided records for that timeframe. In regard to the records relating to the accident mentioned by the Applicant’s lawyer on September 20, 2023, those records were provided to the Applicant on December 28, 2023 (CP 190-23P). The first request (CP 173-23P) was specifically seeking only medical file records which included the discharge and

physicians orders from the [name of hospital withheld]. These medical files are located in the on-site medical unit. Other records, relating to the accident itself would not be placed on the Applicant's medical record. In request number CP 190-23P, the Applicant sought all their corrections files, including their medical file from [name withheld] Correctional Center. In this request, the Applicant received all their institutional records which included details of the accident on September 20, 2023. It is the Ministry's practice to provide the Applicant all their personal information and personal health information responsive to the request, however, not to provide redundant records from request to request. Should the Applicant seek to have multiple copies of the same information, the Ministry would typically create a fee estimate for multiple versions of the same records. The applicant would have then received all of their records pertaining to the accident on September 20, 2023 from both access requests CP 173-23P and CP 190-23P.

- [5] The Applicant's lawyer stated they were not satisfied with Corrections' response and wanted to continue with a review of its reliance on subsections 27(1) of HIPA and 29(1) of FOIP, and of its search efforts. On May 15, 2024, my office provided notice to Corrections and the Applicant that I would review these issues.
- [6] On July 12, 2024, Corrections contacted the Applicant's lawyer to provide copies of two records packages the Applicant had viewed while incarcerated. Corrections stated that the correctional facility (facility) had placed the records with the Applicant's belongings and that the Applicant was intended to take them upon release, but apparently had not. Corrections believed these would be the "missing" records the Applicant's lawyer sought.
- [7] The Applicant's lawyer responded to Corrections on July 17, 2024, stating that they were "still seeking further disclosure." The Applicant's lawyer stated that one part of the record referenced photos (related to an incident the Applicant had been involved in) were taken, but that no photos were part of the disclosure. The Applicant's lawyer also stated they were of the belief that "there should be more log reports" as there was only one mention of the incident in question in the records they had received. The Applicant's lawyer still wanted my office to review Corrections' search efforts.
- [8] On July 16, 2024, Corrections provided my office with its submission. The Applicant/Applicant's lawyer did not provide a submission.

II RECORDS AT ISSUE

- [9] Corrections withheld one statement on page 156 in part pursuant to subsection 27(1) of HIPA.
- [10] Corrections withheld pages 56, 65, 112 to 114, 155, 156, 159, 165, 170 and 173 in part pursuant to subsection 29(1) of FOIP.
- [11] There are also two pages that Corrections withheld, in full, from the Applicant pursuant to subsection 29(1) of FOIP. Corrections refers to these as pages 318 and 321 in my office's copy of the records. Corrections, however, confirmed that because it was withholding these pages in full, it did not include them in the Applicant's copy of the responsive records. Corrections stated it, "reflects an old practice whereby the Ministry would withhold the page of the record in full rather than redacting the page in full when an exemption was applied to the entire page of the record." To be transparent, if Corrections was claiming an exemption, it should have released these pages with redactions to the Applicant. The areas of content cover about half of each page, and so redacting those areas and releasing the remainder to the Applicant should not have been a problem. I have also said that public bodies should release innocuous parts of a record, such as titles, when redacting content so that an Applicant has a sense of what has been withheld and as public bodies should not withhold information to which no exemption applies. To be transparent and so that Applicants are aware of what records exist and what exemptions are being applied to them, I suggest Corrections not continue with its former practice and instead release pages with redactions added. Regardless, I will refer to these two pages as pages 318 and 321 in my review.
- [12] In its submission, Corrections stated it is relying on subsection 15(1)(c) of FOIP on page 318 alongside its reliance on subsection 29(1) of FOIP. Corrections added that it is also relying on subsection 15(1)(m) of FOIP on page 321 alongside subsection 29(1) of FOIP. As these are discretionary exemptions that Corrections did not raise in its section 7 decision to the Applicant, I will not consider them as per section 2-4 of my office's, [*Rules of Procedure*](#).

III DISCUSSION OF THE ISSUES

1. Do I have jurisdiction?

[13] Corrections qualifies as a “government institution” pursuant to subsection 2(1)(d)(i) of FOIP.

[14] Since Corrections is claiming subsection 27(1) of HIPA applies, I need to determine if HIPA is engaged. For HIPA to be engaged, three elements must be present: 1) there must be a trustee; 2) there must be personal health information; and 3) the personal health information must be in the custody or control of the trustee.

[15] Corrections is a trustee pursuant to subsection 2(1)(t)(i) of HIPA as follows:

2(1) In this Act:

...

(t) “**trustee**” means any of the following that have custody or control of personal health information:

(i) a government institution;

[16] Next, Corrections claims there is personal health information on a statement on page 156 that relates to the “mental health of another individual.” Upon review, the withheld statement alludes to the mental health state of a named individual, and so qualifies as personal health information as defined by subsection 2(1)(m)(i) of HIPA as follows:

2(1) In this Act:

...

(m) “**personal health information**” means, with respect to an individual, whether living or deceased:

(i) information with respect to the physical or mental health of the individual;

[17] To have “possession” or “custody” of a record means to have physical possession of it with a measure of control, while to have “control” means to have authority to manage a record, including restricting, regulating and administering its use, disclosure or disposition. The record in question is in Corrections’ possession/custody or control, and so the third element is met. HIPA is, therefore, engaged.

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

2. Did Corrections properly apply subsection 27(1) of HIPA?

[19] I have already determined there is personal health information contained in the statement on page 156 as defined by subsection 2(1)(m)(i) of HIPA. Corrections is only relying on subsection 27(1) of HIPA on this piece of information claiming that it refers to someone other than the Applicant. Subsection 27(1) of HIPA provides as follows:

27(1) A trustee shall not disclose personal health information in the custody or control of the trustee except with the consent of the subject individual or in accordance with this section, section 28 or section 29.

[20] Upon review, I note that the information does not refer to the Applicant. However, the surrounding portions that Corrections released to the Applicant make it clear that the Applicant is the one who provided this information to Corrections during an interview. In past reports, I have stated that it would amount to an “absurd result” to withhold information that an applicant has provided, where the applicant was present when the information was being given, or that would clearly be within the applicant’s knowledge (e.g., [Review Report 148-2023](#), [Review Report 155-2022](#)). This is based on the well-established principle of statutory interpretation that the legislature does not intend to produce absurd consequences.

[21] Because the Applicant provided the information, I find that it would be an absurd result to withhold from them the statement on page 156 pursuant to subsection 27(1) of HIPA. I recommend that Corrections release this information to the Applicant within 30 days of the issuance of this Report.

3. Did Corrections properly apply subsection 29(1) of FOIP?

[22] Corrections withheld pages 56, 65, 112 to 114, 155, 156, 159, 165, 170 and 173 in part pursuant to subsection 29(1) of FOIP. As previously mentioned in this Report, Corrections also withheld, in full, what it refers to as pages 318 and 321 in my office's copy of the records pursuant to subsection 29(1) of FOIP. Subsection 29(1) of FOIP protects the privacy of individuals whose personal information is contained within records responsive to an access to information request made by someone else. It states:

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.

[23] Subsection 29(1) of FOIP applies to personal information as defined by subsection 24(1) of FOIP. The list at subsection 24(1) of FOIP, however, is not exhaustive. To qualify as personal information, 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*, Chapter 6, "Protection of Privacy", updated January 18, 2023 [*Guide to FOIP*, Ch. 6], pp. 32 - 33).

[24] Corrections stated it applied subsection 29(1) of FOIP to phone numbers of other individuals (subsection 24(1)(e) of FOIP), the criminal history of other individuals (subsection 24(1)(b) of FOIP), the Applicant's opinion of another individual (subsection 24(1)(h) of FOIP), birthdates of other individuals (subsection 24(1)(a) of FOIP) and the name of another individual (subsection 24(1)(k) of FOIP). Corrections added that subsection 24(1)(e) of FOIP defines, "business address and business telephone number" as personal information. As such, Corrections stated that it does not feel, "compelled to redact the names of individuals who are not officers or employees of a government institution",

information which appears on page 114. Corrections stated it withheld pages 318 and 321 in full as these pages contain personal information about individuals other than the Applicant. Corrections calls each of these two pages a “Log Detail Report.”

[25] Upon review, I note the following where Corrections withheld information pursuant to subsection 29(1) of FOIP, in part:

- On pages 58 and 65, Corrections withheld the phone numbers of individuals connected or related to the Applicant; it appears the Applicant provided this information to the writer.
- On pages 112, 113, 156 and 165, 170 (both redactions on this page) and 173 (both redactions on this page), Corrections withheld the same statement (i.e., it is the same statement repeated multiple times) the Applicant made to the writer about someone the Applicant had been discussing.
- On page 114, Corrections withheld the name of a police member.
- On pages 155 and 156, Corrections withheld the contact information and birth dates of individuals who are related to the Applicant or who the Applicant would otherwise know. On page 156, Corrections withheld an address where it states, “[The Applicant] informed this writer...”
- On page 159, Corrections withheld the phone number of an Applicant’s close family member. It appears the Applicant would have provided this information to the writer.

[26] As mentioned in my review of subsection 27(1) of HIPA, it is an absurd result to withhold information from an Applicant that they provided themselves, if they were present when it was given, or if it would otherwise be within their knowledge. It appears the Applicant provided the withheld information on pages 56, 65, 112, 113, 155, 156, 159, 165, 170 and 173, or the information would clearly be within their knowledge. I find it would be an absurd result to withhold from the Applicant the information on these pages pursuant to subsection 29(1) of FOIP. I recommend Corrections release this information to the Applicant within 30 days of the issuance of this Report.

[27] On page 114, the name of the police member appears in connection with the Applicant’s file or matter with the police. The member is then working in their professional and not

personal capacity. I've said many times before (e.g., [Review Report 268-2021](#), [Review Report 137-2024](#)) that identifying an individual working in a professional capacity does not disclose something personal about them, and so does not constitute personal information. I find, then, that Corrections has not properly applied subsection 29(1) of FOIP to page 114. As such, I recommend that Corrections release this information to the Applicant within 30 days of the issuance of this Report.

[28] Regarding pages 318 and 321, Corrections refers to these pages as “Log Detail Report(s).” Corrections’ argument to withhold these pages in full is because they refer “solely” to “other individuals and does not contain any information about the Applicant.” Corrections further explained the Log Detail Reports are likely contained in the Applicant’s records because the respective incidents occurred in the Applicant’s unit.

[29] Upon review, page 318 contains information about an incident and opinions about a couple of individuals who are not the Applicant. The information is connected to the incarceration of the individuals named. Page 321 contains information of a similar nature also involving individuals who are not the Applicant. It is not apparent that the Applicant would know or be aware of what occurred, and neither incident occurred on the date (or in the same month as) the Applicant stated they were involved in an incident. I am satisfied, then, that the information would be the personal information of other individuals as defined by subsections 23(1)(b), (h) and (k)(i) of LA FOIP as follows:

23(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;

...

(h) the views or opinions of another individual with respect to the individual;

...

(k) the name of the individual where:

(i) it appears with other personal information that relates to the individual; or

[30] Based on this, I find Corrections properly applied subsection 29(1) of FOIP to pages 318 and 321 except to the portions at the top of each page and the heading information that identify these pages as “Log Detail Reports”. I recommend that Corrections continue withholding the personal information on these pages pursuant to subsection 29(1) of FOIP but release the portions identifying each record as a Log Detail Report to the Applicant within 30 days of the issuance of this Report.

4. Did Corrections conduct an adequate search for records?

[31] Subsection 5.1(1) of FOIP states:

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

[32] My office’s *Guide to FOIP*, Chapter 3, “Access to Records”, updated May 5, 2023 (*Guide to FOIP*, Ch. 3) at page 12, states that subsection 5.1(1) of FOIP requires a government institution to respond to an applicant’s access to information request openly, accurately and completely. This means that government institutions should make reasonable efforts to not only identify and seek out records responsive to an applicant’s access to information request, but to explain the steps in the process.

[33] Regarding the obligation to search for records, the threshold to be met is one of “reasonableness.” In other words, it is not a standard of perfection, but rather what a fair and rational person would expect or consider acceptable.

[34] The *Guide to FOIP*, Ch. 3, also states at page 12, that a reasonable search is one in which an employee, experienced in the subject matter of the records, expends a reasonable effort to locate records which are reasonably related to the request. What is reasonable depends on the request and related circumstances. The local authority should provide my office with detailed information about its search efforts to conduct a search.

[35] When a government institution receives a notice of a review from my office requesting details of its search efforts, some or all the following can be included in the government institution's submission (not exhaustive):

- For personal information requests – explain how the individual is involved with the government institution (i.e., client, employee, former employee etc.) and why certain departments/divisions/branches were included in the search.
- For general requests – tie the subject matter of the request to the departments/divisions/branches included in the search. In other words, explain why certain areas were searched and not others.
- Identify the employee(s) involved in the search and explain how the employee(s) is experienced in the subject matter.
- Explain how the records management system is organized (both paper & electronic) in the departments/divisions/branches included in the search.
- Describe how records are classified within the records management system. For example, are the records classified by:
 - Alphabet
 - Year
 - Function
 - Subject
- Consider providing a copy of your organization's record schedule and screen shots of the electronic directory (folders & subfolders).
- If the record has been destroyed, provide copies of record schedules and/or destruction certificates.
- Explain how you have considered records stored off-site.
- Explain how records that may be in the possession of a third party but in the government institution's control have been searched such as a contractor or information management service provider.
- Explain how a search of mobile electronic devices was conducted (i.e., laptops, smart phones, cell phones, tablets).
- Explain which folders within the records management system were searched and how these folders link back to the subject matter requested. For electronic folders – indicate what key terms were used to search if applicable.

- Indicate the calendar dates each employee searched.
- Indicate how long the search took for each employee.
- Indicate what the results were for each employee's search.
- Consider having the employee that is searching provide an affidavit to support the position that no record exists or to support the details provided. For more on this, see [*Using Affidavits in a Review with the IPC*](#).

(*Guide to FOIP*, Ch 3, pp. 14-15)

[36] Applicants must establish the existence of a reasonable suspicion that a government institution is withholding a record or has not undertaken an adequate search for a record (*Guide to FOIP*, Ch. 3, p. 13). Initially, the Applicant's lawyer questioned why Corrections had not provided records as follows:

Correctional records and medical records related to an accident that took place on September 20, 2023 at [name withheld] Provincial Correctional Centre that involved [the Applicant]. The accident resulted in [the Applicant's] [injury]. There are no correctional or medical records disclosed regarding the accident or for the month of September, when the accident occurred.

[37] My office shared this information with Corrections. Corrections responded back that the Applicant had made "several requests to the Ministry in the last year", and then itemized those requests. Corrections added what is quoted at paragraph [4] of this Report, which had been shared with the Applicant's lawyer. The Applicant's lawyer was not satisfied with that response and wished to continue with a review of Corrections' search efforts.

[38] As previously mentioned in this Report, on July 12, 2024, Corrections contacted the Applicant's lawyer. In that contact, Corrections advised the Applicant's lawyer that it had discovered the Applicant had not taken two sets of records they had received while incarcerated. Corrections then provided those records to the Applicant's lawyer to determine if they would fulfill the assumption that records were still missing or had not been provided. The Applicant's lawyer responded to Corrections as follows on July 17, 2024:

I have reviewed the attached documents, and we are still seeking further disclosure. As noted on page 4 of 162 under the September 20, 2023 log date, photos were taken of the incident. The photos were not disclosed. Further, we believe that there should be more log reports of the incident as page 4 of 162 is the only mention by a correctional staff member, not a medical staff member, of the incident in all of the disclosed documents.

[39] In its submission, Corrections did not directly address what the Applicant's lawyer stated above. Corrections contends its search was complete because it, essentially, disclosed records to the Applicant in accordance with the three different access requests they had made. Corrections also notes that it provided records to the Applicant's lawyer on July 12, 2024, as explained above, ostensibly as a step to ensure the Applicant's lawyer had access to all records that Corrections had provided to the Applicant. Corrections stated that it had "no way of knowing what occurred between the Applicant and [their] legal representative", apparently assuming that the Applicant's lawyer did not have copies of what the Applicant received while incarcerated.

[40] In terms of physical searches, Corrections stated that six administrative assistants at the facility who are "trained in records management" undertook the search as part of their "day to day duties." Corrections added there are both paper and electronic records, including "Clinic", "Programming" and "Admitting". Apparently, "Clinic" records refer to the "medical clinic" and are "kept separate from the other correctional files." Regarding physical file retention, Corrections stated that records for inmates are kept for three years after discharge, after which they are sent to "Record Storage". Regarding electronic records, Corrections explained that its "electronic system" is called the "Criminal Justice Information Management System" or "CJIMS". The administrative assistants also conduct searches on CJIMS. To search CJIMS, the user searches the inmate's name and can "filter to the general log", which may "have multiple entries from different areas of the criminal justice system." Users verify the correct inmate by cross-referencing birthdate, which the administrative assistants apparently did in this case. They apparently also searched by the Applicant's name and a known alias.

[41] In this matter, after completing the search and compiling records, the administrative assistants narrowed by the dates the Applicant requested. According to Corrections, the

administrative assistants searched on two separate dates. After completing their searches, the administrative assistants forwarded the records to Corrections' access and privacy office.

[42] I do not question where Corrections searched or who was involved; rather, I question two things the Applicant's lawyer does: 1) if photos were taken in relation to the incident the Applicant was involved in as stated in the records, then where are those photos, and: 2) why is there only one mention in the records of the incident, which involves an injury? It does not mean that that photos or additional records exist, but the question of their existence is valid. I would, at least, expect a reasonable explanation to help the Applicant and their lawyer understand or be better informed.

[43] To respond "completely" does, as Corrections states, mean to respond according to the parameters set by an applicant. This is done within a framework of reasonableness or what a reasonable person would expect in the circumstances. It is natural, though, that the Applicant and their lawyer would ask the questions outlined above.

[44] In addition to responding "completely" to an access request, a government institution also needs to respond "accurately". This includes conducting a line-by-line review of the record to understand the responsiveness or nature of the records. This should help the government institution identify other records it needs to search for, such as photos or attachments that are mentioned in the records. It also helps a government institution be in a better position to explain why, as is the case in this matter, it did not locate records, particularly when asked by an applicant.

[45] Accordingly, I find Corrections search was not reasonable.

[46] I recommend that within seven days of the issuance of this Report, Corrections conduct a further search for the photos that are mentioned in the records on page 4 as outlined by the Applicant's lawyer and, if located, release the photos to the Applicant subject to any exemptions found to apply.

[47] I recommend that within seven days of the issuance of this Report, Corrections conduct a further search for records related to the incident that would have been created in the month of September 2023 as outlined by the Applicant's lawyer and, if located, release them to the Applicant subject to any exemptions found to apply.

[48] In the absence of locating photos or further records as outlined at paragraphs [46] and [47] of this Report, I recommend that within seven days of the issuance of this Report that Corrections provide the Applicant and my office with its reasons for why these records were not located.

IV FINDINGS

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

[50] I find that it would be an absurd result to withhold from the Applicant the information on page 156 pursuant to subsection 27(1) of HIPA.

[51] I find that it would be an absurd result to withhold from the Applicant the information on pages 56, 65, 112 to 114, 155, 156, 159, 165, 170 and 173 pursuant to subsection 29(1) of FOIP.

[52] I find that Corrections properly applied subsection 29(1) of FOIP to pages 318 and 321 except to the portions at the top of each page and the heading information that identify these pages as "Log Detail Reports".

[53] I find that Corrections search was not reasonable.

V RECOMMENDATIONS

[54] I recommend that Corrections release the withheld portion of pages 56, 65, 112 to 114, 155, 156, 159, 165, 170 and 173 to the Applicant within 30 days of the issuance of this Report.

- [55] I recommend that Corrections continue withholding the personal information on pages 318 and 321 pursuant to subsection 29(1) of FOIP but release the portions identifying each record as a Log Detail Report to the Applicant within 30 days of the issuance of this Report.
- [56] I recommend that within seven days of the issuance of this Report, Corrections conduct a further search for the photos that are mentioned in the records on page 4 as outlined by the Applicant's lawyer and, if located, release the photos to the Applicant subject to any exemptions found to apply.
- [57] I recommend that within seven days of the issuance of this Report, Corrections conduct a further search for records related to the incident that would have been created in the month of September 2023 as outlined by the Applicant's lawyer and, if located, release them to the Applicant subject to any exemptions found to apply.
- [58] In the absence of locating photos or further records as outlined at paragraphs [46] and [47] of this Report, I recommend that within seven days of the issuance of this Report that Corrections provide the Applicant and my office with its reasons for why these records were not located.

Dated at Regina, in the Province of Saskatchewan, this 13th day of November, 2024.

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