



DISREGARD DECISION 291-2026

Rural Municipality of Reford No. 379

October 14, 2026

Summary:

The Rural Municipality of Reford No. 379 (RM) extended the time to respond to the Applicant's access to information request under sections 12(1)(a)(i) and (ii) of *The Local Authority Freedom of Information and Protection of Privacy Act (LA FOIP)*. The RM subsequently applied to the Commissioner for authorization to disregard the Applicant's request under sections 43.1(2)(a) and (b) of *LA FOIP*.

The Commissioner found that the RM met the requirements to extend the time set out in section 12(1)(a)(ii) of *LA FOIP*.

The Commissioner found that there were reasonable grounds to disregard the Applicant's access request of July 2, 2026, pursuant to section 43.1(2)(b) of *LA FOIP*. The Commissioner granted the RM application to disregard the Applicant's access request of July 2, 2026.

The Commissioner also authorized the RM to disregard future access requests made by, or on behalf of, the Applicant in relation to the consultant in this matter.

I BACKGROUND

[1] On July 2, 2026, the Rural Municipality of Reford No. 379 (RM) received a \$20.00 application fee from the Applicant along with the following access to information request:

This access request is for records relating to the engagement of [name of consultant]¹, carrying on business as [name of third party consulting firm], by the RM of Reford No. 379. Please see the attached schedule for the complete description of the records requested.

¹ OIPC uses square brackets to protect the privacy of individuals associated with this review.

...

Please provide the following records:

1. Recruitment and Engagement Any records relating to the recruitment, recommendation, selection or engagement of [the consultant] (carrying on business as [name of consulting firm]) prior to the execution of [their] January 11, 2024 contractual agreement, including any proposals, recommendations, offers, approvals, correspondence or other records documenting the recommendation, selection, approval or decision to retain [them].
2. Contractual Records Any amendments, extensions, renewals, schedules, appendices or subsequent contracts or agreements relating to [the consultant's] January 11, 2024 contractual engagement.
3. Invoices and Payment Records All invoices, accounts or statements submitted by [the consultant] (or [name of consulting firm]) for services provided to the RM, together with any records authorizing, approving, processing or supporting payment of those invoices, accounts or other compensation for services rendered.
4. Written Work Assignments Any written work assignments, written directions, written instructions, work plans, task lists or other records assigning duties or defining the scope of work provided by the Chief Administrative Officer to [the consultant] (or [name of consulting firm]) pursuant to [their] contractual engagement.
5. Work Product Any records created, maintained, received or submitted by [the consultant] (or [name of consulting firm]) in carrying out duties assigned under [their] contractual engagement, including but not limited to reports, memoranda, handwritten notes, investigation notes, meeting notes, summaries or similar records documenting work performed.
6. Continuation of Engagement Any records documenting whether [the consultant] (or [name of consulting firm]) contractual engagement was continued, renewed, extended, resumed or otherwise engaged following completion of her January 11, 2024 contractual engagement, including but not limited to any subsequent contract, consulting agreement, purchase order, invoice, payment authorization or written work assignment.
7. Authority for Retention Any records identifying the authority under which [the consultant] (or [name of consulting firm]) was retained, including any council resolution, delegation of authority, administrative approval or other record authorizing or approving [their] engagement. For greater certainty, this request seeks the records ordinarily created or maintained in administering a publicly funded contractual engagement. Where a responsive record exists under a different title or format but is responsive to the substance of this request, it is included within the scope of this request.

- [2] By letter dated July 6, 2026, the RM notified the Applicant that it was extending the 30-day response time pursuant to sections 12(1)(a)(i) and (ii) of *The Local Authority Freedom of Information and Protection of Privacy Act (LA FOIP)*.² The RM noted that if the Applicant wished, they could exercise their right to request a review of the RM's decision to extend the response time from the Office of the Saskatchewan Information and Privacy Commissioner (OIPC). The Applicant did not request such a review.
- [3] On August 18, 2026, the RM emailed OIPC with an application to disregard the Applicant's request. The RM provided supporting documentation with respect to the application. A copy of this application was provided to the Applicant. The RM requested that the Applicant's request be disregarded pursuant to section 43.1(2)(a) and (b) of *LA FOIP*.
- [4] On August 19, 2026, OIPC advised the RM and the Applicant that the clock to process the Applicant's access request would be suspended. OIPC also provided notice that the RM's application to disregard the Applicant's request of July 2, 2026 would now be considered. The Applicant was invited to provide a response by August 28, 2026, which they did on August 27, 2026.

II DISCUSSION OF THE ISSUES

1. Jurisdiction

- [5] The RM is a "local authority" pursuant to section 2(1)(f)(i) of *LA FOIP*. There is jurisdiction to consider the RM's application to disregard under section 43.1 of *LA FOIP*.

2. Did the RM properly extend the time pursuant to sections 12(1)(a)(i) or (ii) of *LA FOIP*?

- [6] Within 30 days of receiving an access to information request made by an applicant under section 6(1) of *LA FOIP*, a local authority is required to provide a response under section

² [*The Local Authority Freedom of Information and Protection of Privacy Act*](#), 1990-91, c L-27.1, as amended.

7(2) of *LA FOIP*. The local authority may extend the time to provide a response by *up to* an additional 30 days if it can demonstrate that one of the provisions set out in section 12(1) of *LA FOIP* is justified. The relevant provisions here are as follows:

Extension of time

12(1) The head of a local authority may extend the period set out in section 7 or 11 for a reasonable period not exceeding 30 days:

(a) where:

(i) the application is for access to a large number of records or necessitates a search through a large number of records; or

(ii) there is a large number of requests;

and completing the work within the original period would unreasonably interfere with the operations of the local authority;

...

(3) Within the period of extension, the head shall give written notice to the applicant in accordance with section 7.

[7] The first step in our analysis is to determine if the RM provided the notice of extension to the Applicant, as set out in section 7(2) of *LA FOIP*, within the first 30 calendar days.³ The access request was received Thursday, July 2, 2026, and the RM would have had 30 days in which to respond, which was August 1, 2026. Since that day was a Saturday, the time to respond moved to August 3, 2026. The RM provided its notice to the Applicant on July 6, 2026, clearly within the required 30 days.

[8] The second step is to determine if the RM provided notice of the application to disregard within the period of extension as required by section 12(3) of *LA FOIP*. A notice of extension gives a local authority up to 60 days to provide a response under section 7 of *LA FOIP*. Since the RM received the Applicant's access request on Thursday, July 2, 2026, it would have had to provide its notice of its application to disregard by Monday, August 31,

³ The computation of calendar days is as per section 2-28 of [The Legislation Act](#), SS 2019, c L-10.2, as amended.

2026. The RM provided its application to disregard on Tuesday, August 18, 2026, also within the period of extension set out by section 12(3) of *LA FOIP*.

[9] Finally, we must determine if the RM properly invoked section 12(1)(a)(i) or (ii) of *LA FOIP*. Only one of the clauses in section 12(1)(a) must to apply. We begin with section 12(1)(a)(ii) of *LA FOIP*. An extension under this provision is permitted when:⁴

1. There are a large number of requests that the local authority is dealing with at the time; and
2. Completing the work within the original 30 days would unreasonably interfere with the operations of the local authority.

[10] The RM has a small population of only 222 individuals.⁵ According to its website, there is one Administrator. When the RM receives an access request it is statutorily required to process it within the timeframes mandated by *LA FOIP*. The RM is also statutorily required to participate in any reviews initiated by applicants that come to the attention of OIPC.

[11] The RM submitted that the Applicant has made approximately 40 access requests to its administrative office since 2023. This averages to roughly ten requests a year. This is in addition to the requests that the RM receives from other individuals in the community. Currently, the RM has nine requests for review with OIPC that are at various stages, including five that have gone to notice of review.

[12] OIPC also has a history with the Applicant. Between 2023 and 2026, the Applicant has initiated 30 requests for review. OIPC has issued 12 review reports in total to this Applicant alone. This may be the most reports for a lone applicant than any other in this province. The Applicant has also been subject of several applications by the RM to disregard between 2024 to 2026. In the past, OIPC has been tempered with respect to this Applicant and only

⁴ OIPC [Review Report 053-2023](#) at paragraph [25], which considered the equivalent provision section 12(1)(a)(ii) in [The Freedom of Information and Protection of Privacy Act](#), SS 1990-91, c F-22.01, as amended.

⁵ <https://www.rmofreford.com/>

granted two disregards.⁶ There are also 11 requests for review that OIPC has received from other applicants that we believe are associated with the present Applicant. Of these 11 requests for review, OIPC has released four reports to date.

[13] The RM attested to the fact that its obligations under *LA FOIP*, coupled with ongoing disputes involving the Applicant, have had a cumulative impact on its overall operations. The volume of *LA FOIP* activity that this relatively small RM experiences is radically disproportionate to the volume experienced by any other RM in Saskatchewan. The fact that the RM must now hire external assistance and top-notch but expensive outside legal counsel to manage access requests is testament to the negative impact these requests have had on the RM's ability to tend to other business.

[14] The foregoing leads us to conclude that the volume of requests the RM is dealing with, not to mention what it has historically dealt with, has had a cumulative impact on its operations that would have necessitated additional time. OIPC now must sadly conclude that close scrutiny must be made with respect to the access to information focus upon this tiny rural municipality. We are concerned that the volume of applications from this Applicant now begins to resemble something akin to targeted harassment.

[15] We are satisfied that the RM met the requirements to extend the time to respond to the Applicant's July 2, 2026, access request under section 12(1)(a)(ii) of *LA FOIP*. We now proceed with considering the RM's application to disregard this request.

3. Should the RM's application pursuant to sections 43.1(2)(a) and (b) of *LA FOIP* be granted?

[16] Section 43.1 of *LA FOIP* provides a local authority with the ability to apply to the Commissioner with a request to disregard access to information applications or requests:

⁶ These are OIPC [Disregard Decision 070-2024](#) and [Disregard Decision 055-2026](#).

Power to authorize a local authority to disregard applications or requests

43.1(1) The head may apply to the commissioner to disregard one or more applications pursuant to section 6 or requests pursuant to section 31.

(2) In determining whether to grant an application or request mentioned in subsection (1), the commissioner shall consider whether the application or request:

(a) would unreasonably interfere with the operations of the local authority because of the repetitious or systematic nature of the application or request;

(b) would amount to an abuse of the right of access or right of correction because of the repetitious or systematic nature of the application or request;
or

...

(3) The application pursuant to subsection 6(1) or the request pursuant to clause 31(1)(a) is suspended until the commissioner notifies the head of the commissioner's decision with respect to an application or request mentioned in subsection (1).

(4) If the commissioner grants an application or request mentioned in subsection (1), the application pursuant to subsection 6(1) or the request pursuant to clause 31(1)(a) is deemed to not have been made.

(5) If the commissioner refuses an application or request mentioned in subsection (1), the 30-day period mentioned in subsection 7(2) or 31(2) resumes.

[17] An application to disregard is a very serious matter because, if granted, it removes an applicant's access to information rights with respect to that particular request. The right to information is a quasi-constitutional right and any interference with this right must be carefully considered.⁷ However, *LA FOIP* recognizes that not all access requests are legitimate. Section 43.1 of *LA FOIP* exists to preserve the proper intent and functioning of the statute. Former British Columbia Information and Privacy Commissioner (BC OIPC), David Loukidelis, noted the importance of the good faith responsibility that must accompany this quasi-constitutional right:⁸

⁷ [*Canada \(Information Commissioner\) v. Canada \(Minister of National Defence\)*](#), 2011 SCC 25, [2011] 2 SCR 306 at paragraphs [40] and [79].

⁸ BC OIPC [Order F19-25](#) (June 21, 2019), at paragraph [8].

...Access to information legislation confers on individuals such as the respondent a significant statutory right, *i.e.*, the right of access to information (including one's own personal information). All rights come with responsibilities. The right of access should only be used in good faith. It must not be abused. By overburdening a public body, misuse by one person of the right of access can threaten or diminish a legitimate exercise of that same right by others, including as regards their own personal information. Such abuse also harms the public interest, since it unnecessarily adds to public bodies' costs of complying with the Act. Section 43 exists, of course, to guard against abuse of the right of access...

Subsection 43.1(2)(b) of LA FOIP

[18] For this provision to be found to apply, the local authority must demonstrate that the applicant's access to information requests are of such a repetitious or systematic nature that they amount to an abuse of the right of access. The following analytical test is helpful:⁹

1. Are the requests for access repetitious or systematic?
2. Do the repetitious or systematic requests amount to an abuse of the right of access?

1. Are the requests for access repetitious or systematic?

[19] We observe the following definitions:¹⁰

- "Repetitious" requests are requests that are made two or more times. Repetitious requests can also be ones that are sufficiently connected to other requests or that pertain to the same topic.¹¹
- "Systematic" requests are those made according to a method or plan of acting that is organized and carried out according to a set of rules or principles. It includes a pattern of conduct that is regular or deliberate. To be methodical; arranged, conducted, according to system; deliberate.

⁹ OIPC [Disregard Decision 306-2025](#) at paragraph [9].

¹⁰ *Ibid* at paragraph [10].

¹¹ BC OIPC [Decision F05-01](#) (February 3, 2005) at paragraph [17], as adopted by OIPC in [Disregard Decision 225-2025](#) at paragraph [19] and in [Disregard Decision 306-2025](#) at paragraphs [14] and [15].

Factors to consider include:

- Are the requests similar in nature, do they overlap, or do they stand alone as being different?
- Are the requests close in their filing time?
- Does the applicant engage in a determined effort to request the same information?
- Is there a pattern of conduct on the part of the applicant in making repeated requests that may be seen to be regular or deliberate? Does the applicant methodically request records or information in many areas of interest over extended periods of time rather than focus on accessing specific records or information of identified events or matters?
- Has the applicant requested records or information of various aspects of the same issue?
- Has the applicant made a number of requests related to matters referred to in records already received?
- Does the applicant follow up on requests by making further access requests?
- Does the applicant question whether records exist when told they do not?
- Can the requests be seen as a continuum of previous request rather than in isolation?

[20] The RM submitted that there is repetition in the types of records the Applicant constantly seeks. The RM explained several access requests from this Applicant that were directly about the RM consultant who is the focus of the request:

RM File Number	Wording of Access Request
09-24 and duplicated in 10-24	“Contracts hiring [name of consultant] ¹² and [other contracted individual]. Minutes of the Meeting where they were both hired outlining the date hired and conditions of their contracts.”

¹² Same consultant as named in the current access request of this Report.

14-24	“Copy of employment contract for the consultant...”
17-24	“I am requesting my complete Personnel File covering April 29th, 2019 through to today, July 15th, 2024.” [RM noted that this response included records involving the consultant]
19-24	“Requesting the unedited copy of the full report with complete supporting documentation for the summary of the investigation and complete summary of interviews conducted, regarding my submitted Harassment Grievance on January 16, 2024 and deemed concluded on March 20, 2024.” [RM noted that the consultant acted as recording secretary for the investigation]
14-25	“Please see the attached detailed request. I am seeking all RM records relating to myself and all references to my name, employment, termination, OHS matters, reinstatement, post-reinstatement communications, contractor interactions, and any discussions involving... Please treat the attached PDF as part of this request.” ... [RM noted that for this request, the Applicant specifically directed a search of the consultant’s records and communications]

[21] The Applicant’s submission denied repetition. The Applicant submitted, surprisingly, that the current request concerns a materially new issue. The Applicant explained that the current request focused on “further engagement” between the RM and the exact same consultant for functions related to the administration of *LA FOIP*. The Applicant claimed to not know about the “further engagement” and “available council minutes ... contain no identified resolution to [the consultant] or [name of consulting firm] or *LA FOIP* processing help.”

[22] The threshold for determining whether a request is repetitious is not high. It can involve requests that continue a theme or that are sufficiently connected.¹³ The Applicant is fixated

¹³ OIPC [Disregard Decision 363-2025](#) at paragraph [14].

on this consultant and now requests further records regarding the consultant's duties. We find a recurring theme and a sufficient connection between the two requests that qualifies the current request as being repetitious.

2. Do the repetitious or systematic requests amount to an abuse of the right of access?

[23] An “abuse of the right of access” occurs when an applicant uses the *LA FOIP* access provisions in ways that are contrary to its principles and objectives of the legislation. The principles and objectives of privacy legislation in Canada were summarized by the Supreme Court of Canada in 2014:¹⁴

[1] Access to information legislation serves an important public interest: accountability of government to the citizenry. An open and democratic society requires public access to government information to enable public debate on the conduct of government institutions.

[2] However, as with all rights recognized in law, the right of access to information is not unbounded. All Canadian access to information statutes balance access to government information with the protection of other interests that would be adversely affected by otherwise unbridled disclosure of such information.

[24] If a request is repetitious, or if the request is made for some purpose other than to gain access to information - such as to disrupt the affairs of the local authority - then the right of access may be abused unless there is an intervention on the part of the regulator. A “pattern of conduct” requires recurring incidents of related or similar requests. The time span of the requests is also a significant factor. One or more of the following factors may be relevant:¹⁵

- **The number of requests:** are they excessive by reasonable standards?
- **Nature and scope of the request:** are they excessively broad and varied and varied in scope or unusually detailed?

¹⁴ [*John Doe v Ontario \(Finance\)*](#), 2014 SCC 36, [2014] 2 SCR 3 at paragraphs [1] and [2].

¹⁵ *Supra*, footnote 9 at paragraph [18].

- **Purpose of the request:** are the requests intended to accomplish some objective other than to gain access? For example, are they made for nuisance value, or if the applicant's aim to harass or break or burden the system?
- **Timing of the request:** is the timing connected to the occurrence of some other related event, such as a court or tribunal proceeding?
- **Wording of the request:** are the requests or subsequent communications in their nature offensive, vulgar, derogatory or contain unfounded allegations?

Nature and scope of the requests

[25] The RM provided OIPC with the following convincing arguments as to the broad scope and the related themes within the Applicant's requests. We reproduce them here and they are supported by documentation provided by the RM:

RM Submission	RM Explanation (as summarized by OIPC)
The access requests are linked to ongoing personal grievances with the RM.	The records sought concern a consultant who was hired to become involved in matters directly connected to the Applicant's disputes with the RM, including: • a workplace harassment investigation; • the Applicant's employment-related concerns; • the subsequent LA FOIP requests; and • the subsequent proceedings involving OIPC The Applicant has repeatedly pursued records concerning numerous individuals connected to those disputes. The current request continues that pattern with respect to a consultant.
The focus of the access request with respect to this consultant is extremely broad in scope.	The request is extraordinary in its breadth with respect to the single contractor-consultant. The Applicant and the Applicant's advocate¹⁶ have repeatedly sought records relating to this consultant over a period of more than two years. Those requests have included requests for the consultant's employment contract, records relating to their hiring,

¹⁶ The Applicant is closely aligned with another RM resident who functions as an advocate in communications with the RM and OIPC.

	records associated with the workplace harassment investigation, records maintained by the consultant in relation to the Applicant's employment, and broad requests requiring searches of the consultant's communications and files. <i>Records concerning the consultant's employment contract have already been disclosed by the RM.</i> Despite having already obtained records relating to the consultant's retention and contractual relationship with the RM, the Applicant now seeks virtually every remaining category of records concerning the consultant's engagement, including: • all recruitment records; • all selection records; • all approval records; • all invoices; • all payment records; • all work assignments; • all work product; • all continuation records; and • all authorization records. The RM submitted that the current request is not materially different in purpose from earlier requests concerning this consultant's retention. Rather, it seeks to revisit and expand upon information that has previously been requested and already disclosed. The duplicative nature of the current request is a relevant factor supporting a finding that the request is repetitive and forms part of a systematic effort to target a particular individual associated with the RM.
The overall purpose of the access request is unrelated to the objectives of <i>LA FOIP</i>.	The consultant provided a sworn affidavit. This affidavit revealed that references to the consultant continue publicly within an online publication¹⁷ while access requests and review proceedings continued on a parallel basis. The RM submitted that the purpose of the current request appears to be nothing more than an ongoing scrutiny of the consultant and the consultant's involvement with the RM.

¹⁷ The Applicant's advocate in this matter produces a community online publication that targets the consultant on an ongoing basis.

	The current request also provides a portal for the advancement of ongoing grievances concerning the Applicant's disputes with the RM rather than the exercise of a <i>bona fide</i> right of access.
The cumulative effect of all the access requests, and the current request in particular, is abusive.	The OIPC has directed that the focus of a disregard application should be on the cumulative nature and effect of the applicant's conduct. When considered in isolation, the Current Request is extensive. When assessed against: • the Applicant's lengthy history of requests; • prior requests concerning this consultant; • repeated OIPC proceedings; • ongoing disputes involving the RM; and • the public commentary focused on this consultant; There can be no other conclusion than the current request is just the most recent of a continuing pattern that constitutes an abuse of the access process.

Purpose of the requests

[26] The RM provided OIPC with a sworn affidavit from the consultant, dated August 13, 2026. The consultant acknowledged that they worked on a contractual basis for the RM. The consultant served the RM the following ways:

- assisted with the processing of *LA FOIP* requests;
- reviewed and updated various types of documentation such as RM policies and procedures; and
- functioned as the RM secretary/recorder during a workplace harassment investigation.

[27] The consultant noted that following the workplace harassment investigation, their name began to appear in an online publication maintained by the Applicant's advocate. The consultant confirmed that the publication named them specifically and made several references to them throughout 2024 to 2026. The consultant submitted copies of passages from several of the online publications which we provide later in this Report. The consultant added that the Applicant supplied information received through the *LA FOIP*

process to the advocate, who then used the information to target the consultant in the community online publication.

- [28] The Applicant stuck to the submission that the current access request involved “a *bona fide* access purpose”. The Applicant argued that they wish to “understand how a public funded consultant was selected, authorized, directed, paid, and re-engaged, and what work was produced”. The Applicant’s illogical and rambling submission speaks for itself. We provide just a small portion:

The [online publication] is relevant only because the RM relies on it to infer [the Applicant’s] purpose. It should not become a trial of [the Applicant’s advocates’] publication. The necessary attributional bridge is missing.

[The Applicant’s advocate] created, authored, controlled, published, and distributed the [online publication] independently. [The Applicant] did not ask [the Applicant’s advocate] to create it; select its subjects; draft, edit, or proofread it; approve it; or distribute it. [The Applicant’s advocate] did not publish it as [the Applicant’s] representative. [The Applicant] is married to [name of Applicant spouse]. [The Applicant’s advocate] is [their] friend and has assisted [them] in specified administrative, employment, access, and legal matters; they are not spouses, common-law partners, or romantic partners...

Paragraphs 14 and 15 of the [consultant’s] affidavit do not identify the information allegedly supplied only to [the Applicant], the [online publication] passage where it appeared, when or how it was supplied, or why another source was impossible. Much of the cited content came from [the Applicant’s advocate’s] own contract request, public records, or events [they] personally attended.

One concrete example illustrates the problem. The [online publication] reproduced an occupational health and safety order bearing [a councillor’s] initials. LRWS sent [the Applicant] [their] copy by registered mail on a Wednesday. [They] took it to [councillor’s] residence that evening because the RM had not yet received its copy; [the councillor] retained it for the Thursday council meeting, initialled and dated it, and returned it at [the Applicant’s] residence on Saturday. [The Applicant’s advocate] later asked [the Applicant] for permission to reproduce that document, and [they] agreed. It was not then the subject of a confidentiality dispute. Permission to reproduce one document already presented to council is not proof that [the Applicant] developed, directed, or assisted the [online publication] generally, and it does not establish the purpose of RM379-03-26.

The publication chronology also contradicts the asserted ongoing pattern. The affidavit says references continued throughout 2024, 2025, and 2026. Volume 8, published in March 2026, was the final [online publication] edition before the affidavit and contains no reference to [consultant] or [name of consulting firm]. Volume 7 in April 2025 discussed the apparently ended 2024 engagement and stated that the author did not know where [the consultant] had gone. The RM attached selected pages only from Volumes 4 and 6, both from 2024. This record does not establish scrutiny of the undisclosed March 2025 engagement.

Number of requests over time

[29] The Applicant has made roughly 40 access requests of the RM in the last four years. The current request of July 2, 2026, has seven parts to it, all varied in scope. Previous requests by the Applicant have also been similarly broad in scope. The RM provided OIPC with a copy of the Applicant's access request dated December 10, 2025. This request required 25 search terms and was broken into five parts - four of which were further broken into even smaller segments. This request would involve a multitude of searches. The December 10, 2025 access request involved a request for communications involving multiple RM employees, councillors and contractors. It undoubtedly includes a request for many records that the Applicant, and the other individuals associated with the Applicant, have already received. It would undoubtedly involve the tiny RM in a massive "fishing expedition" that would tie up valuable and scarce resources.

[30] We agree that the Applicant's access requests have indeed been grievous to the RM, both in volume of work and cost.

Conclusion

[31] The purpose of an access request is to promote democratic participation and to ensure government accountability. Collateral purposes are legitimate, unless it can be said that the collateral purpose is cloaked in *mala fides*. The Office of the Ontario Information and Privacy Commissioner (ON OIPC) in 2005 laid out the following regarding collateral intentions:¹⁸

¹⁸ ON OIPC [Order MO-1924](#) (May 6, 2005).

This argument necessitates a discussion of whether access requests may be for some collateral purpose over and above an abstract desire to obtain information. Clearly, such purposes are permissible. Access to information legislation exists to ensure government accountability and to facilitate democracy (see *Dagg v. Canada* (Minister of Finance), [1997] 2 S.C.R. 403). This could lead to requests for information that would assist a journalist in writing an article or a student in writing an essay. The *Act* itself, by providing a right of access to one's own personal information (section 36(1)) and a right to request correction of inaccurate personal information (section 36(2)) indicates that requesting one's personal information to ensure its accuracy is a legitimate purpose. Similarly, requesters may also seek information to assist them in a dispute with the institution, or to publicize what they consider to be inappropriate or problematic decisions or processes undertaken by institutions.

To find that these reasons for making a request are “a purpose other than to obtain access” would contradict the fundamental principles underlying the *Act*, stated in section 1, that “information should be available to the public” and that individuals should have “a right of access to information about themselves”. In order to qualify as a “purpose other than to obtain access”, in my view, the requester would need to have an improper objective above and beyond a collateral intention to use the information in some legitimate manner.

[Emphasis added]

[32] OIPC concludes that the Applicant's advocate acts for the Applicant in this current matter but has also acted for the Applicant in several past access request matters with both the RM and OIPC. In Volume 5 of the online community publication, dated April 2024, the advocate referred to the Applicant as their “dear friend”. Certainly, section 49(e) of *LA FOIP* allows for the authorization of a representative, and so the Applicant's use of an advocate is not the issue.

[33] The issue is that the Applicant's advocate conceded that they have asked the Applicant for permission to reproduce at least one document received through an access request in the advocate's online community publication. The advocate concedes that they edit and manage the online publication. Volumes 3 (June 2023) and 4 (March 2024) of the online community publication have chronicled the Applicant's employment history and petty grievances with the RM. Volume 7 (April 2025) included a discussion of the Applicant's termination and subsequent re-hiring along with an ironic defense of rumours that the Applicant “cost this RM all kinds of money”.

- [34] A reasonable person would conclude that the Applicant's interests are clearly shared by the Applicant's advocate and the online community publication has become a public forum to spread discontent with the RM. Freedom of speech is always important but the task of OIPC with an application of this nature is to ensure that there is a direct and clear connection between the Applicant and the advocate. We conclude that the Applicant has a direct interest in the advocate's online community publication.
- [35] This discussion must shift to how the consultant is represented in the online community publication and how this connects to the Applicant's current access request. We noted that the purpose of making an access request is to participate in democracy and to hold public bodies accountable. The line between the legitimate use of information and the use of the access to information regime for an ulterior motive can be a fine one. In this case, we must conclude that the real purpose of this access request is to continue to harass the RM and the consultant. In this sense, the July 2, 2026 access request is illegitimate and contrary to the legislative scheme of *LA FOIP*.¹⁹
- [36] We provide passages in different volumes of the online community publication and note the sad quality of many puerile comments with respect to the consultant:

Volume 4 (March 2024)	The new year brought with it more fresh faces. Yes, you read that right. The hiring freeze did not apply to the Administrator, so at some time back in September, [they] started hiring additional 'office help' ... and last but not least [the consultant] (I have been unable to locate any Order in Council hiring any of these [individuals]). To fill in the background here, after [the Applicant] submitted [their] harassment complaint to Councillor [name of Councillor] on January 16th, [they] received an email notice from the office three days later informing [them] of their investigation to be conducted the week of January 29th. It was signed by the mystery [person] I saw at the rink – [the consultant]. In that email that [the consultant] signed, [they] identified [themselves] by signing "Secretary"... In the same days that followed, this [person] went by [consultant for third party corporation], 'OH&S Rep' on a trip out to the shop, 'OH&S Safety Officer' at the February 8th Council Meeting, 'Administrator' when introduced at the
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¹⁹ OIPC [Disregard Decision 189-2020](#) at paragraph [28].

	Investigation Meeting they ‘secretly’ held in North Battleford... whew! And they say women have 1,000 personalities – I understand why now! Personally, I find it interesting that [the consultant] was fired from [their] last job at [name of other RM] on [date], two days before [the Applicant] was reinstated. I wonder if Council did a background check on [the consultant]? Hmm.. You see, not all R.M.’s in Saskatchewan have websites, but a lot of them do, and [the other RM] has all their UNREDACTED Minutes posted online. Quite interesting and informative... Things went from worse to horrific after [the Applicant] submitted [their] harassment claim. That [the consultant] was at the February 8th Meeting and was invited by [the Reeve] to sit at the table. I was appalled by how [the consultant] spoke to [the Applicant] and the tone [they] used... but was most reprehensible was how Council just sat there and ALLOWED [the consultant] to be condescending and ignorant to [the Applicant]. Just sat there. Never corrected [the consultant] never stopped [them]. Inquiring minds will question just exactly why and how this behaviour was condoned by Council – a clear violation of their Code of Ethics and Code of Conduct, but apparently supported and approved by them. Disturbing. However, the best part is yet to come.
Volume 5 (April 2024)	Ya know what else is hilarious? I remember visiting with a friend and listening to a phone call between this friend and [the Reeve], who was so adamant that they had been searching high and lo trying their very best to locate a certain contract which makes one presume that contracts between individuals and Council are fairly important, yes? But yet, no contract is in any Minutes for the hiring of.... no contract for [the consultant]... only motions authorizing the hiring of [the consultant]
Volume 6 (July 2024)	[The consultant] was hired on a contractual basis, the 11 of January. Funny how it was not passed definitively through Council until January 18th, 2024... seven days after the fact. We paid Contractor [consultant’s name] \$50/hour, plus \$0.60/km, and \$1.25/hour each way for remuneration... [The consultant’s] contract was signed January 11, 2024, but it was not official passed through Order in Council until the January 18th, 2024 Special Meeting of Council... even though they held a Regular Meeting of Council on January 11th...?... the day the contract was signed. he first order of business was to appoint [the consultant] as the Occupational Health & Safety Committee staff representative (something our R.M. has never had before)... strange considering it was only a “temporary” assignment and this position was previously handled by the Foreman... Anyhoo, [the consultant] was also then appointed as the Secretary for the Internal

	Investigative Committee for the Harrassment and Discrimination complaint they received January 17th, 2024... also strange how [their] contract seemingly ended only after our Foreman was put on extended leave after the first three months... so many conicidences... ... Please, someone, because according to Council – [RM employee], [the consultant] and themselves, are exonerated of all wrong doing. They would tell that the fault and blame lies entirely on [the Applicant’s] shoulders. Interesting, no? Sickening, yes? How would any of you dear readers feel if that comment had been directed at you? Or when [the consultant] sat aggressively forward in [their] chair and said, “Okay [Applicant], you’re the foreman and I am going to be blunt with you and you’re not going to like it.” Well, let’s say that I again waited for Council to step up and shut down that mess of disrespect... I found myself at the wrong plate. council simple looked down at their papers engrossed in what was before them, and did not bat an eye at [the consultant’s] tone or [their] words. Note one spoke up to say [the consultant] was out of line. Not. One. Almost as if Council was in agreement with that behaviour and encouraging it... weird, huh? ...[The consultant] even attempted to go after me. I would pay good money to be able to recapture the look on [their] face when [they] tried to force me into taking some papers [they] had. Outside of Council chambers I would have spoke my mind and told [the consultant] to pound sand, ‘cuz that’s where I come from. I politely and firmly told [them] no. I don’t work for the R.M., and have nothing to do with the R.M., so, NO. I would not be intimidated or coerced into receiving something I did not specifically request. I hear tell that I am slated first in line on [the consultant’s] Christmas card list this year! Oh lucky me.
Volume 7 (April 2025)	So where did [the consultant] go? We do not know. [Their] contract termination was never put through Order in Council. We can only go off [their] final paystub dated in May. Funny coincidence how [their] contract ended after [the Applicant] was put on long term leave. I thought [the consultant] was hired as “temporary administrative assistance” to do whatever [RM employee] wasn’t able to keep up to or handle, which is why they fired [that employee] and hired [other RM employee], or was it that [other RM employee] was hired to keep up with whatever [the consultant] couldn’t keep up with or handle, or wait. Are you confused?!...

[37] Within the four corners of this application to disregard, the above conjecture is surely the advocate’s retaliatory efforts for perceived wrongdoings against the Applicant. Continuing to request access to records to feed speculation in an online community publication, with

which the Applicant is directly interested, constitutes harassment. The use of the access to information legislative scheme to harass the RM and an individual hired by the RM is an abuse of the right of access.

[38] There are reasonable grounds to disregard the Applicant's request of July 2, 2026, under section 43.1(2)(b) of *LA FOIP*. The application to disregard is granted. There is no need to consider if grounds exist under section 43.1(2)(a) of *LA FOIP*.

[39] This office has considered similar circumstances in the past where the question was whether a remedy beyond granting a simple disregard was appropriate.²⁰ OIPC took guidance from the Offices of the Information and Privacy Commissioners, first for Ontario (ON OIPC), British Columbia (BC OIPC) and Alberta (AB OIPC) in fashioning an appropriate remedy. Each of these bodies considered that an applicant should be limited in the number of active requests or appeals that could be made in a given period. Consideration was also given to cap the amount of time the public body was required to spend on processing an applicant's access requests.

[40] ***Disregard Decision 181-2021*** is the first and only decision where OIPC considered the retaliatory nature of an applicant and the adverse effects it had on a public body's operation. In addition to granting a disregard, this office also allowed the public body to disregard all other future access requests from the applicant that pertained to a certain motor vehicle accident of 2019.

[41] This Disregard Decision will now be the second such decision. I authorize the RM to disregard all future access requests made by or on behalf of the Applicant that are made in relation to the consultant in this matter.

²⁰ OIPC [Disregard Decision 181-2021](#) at paragraphs [29] to [37].

III DECISION

[42] I grant the application from the RM to disregard the Applicant's access request of July 2, 2026, under section 43.1(2)(b) of *LA FOIP*.

[43] I authorize the RM to disregard all future access requests made by or on behalf of the Applicant that are made in relation to the consultant in this matter.

Dated at Regina, in the Province of Saskatchewan, this 14th day of October, 2026.

Grace Hession David
Saskatchewan Information and Privacy Commissioner