



Office of the
Saskatchewan Information
and Privacy Commissioner

REVIEW REPORT 005-2024

City of Saskatoon

September 6, 2024

Summary:

The Applicant made an access to information request for records from the City of Saskatoon (City). The City responded by withholding portions pursuant to subsections 13(1)(b), 14(1)(m), 16(1)(a), (b) and 28(1) of *The Local Authority Freedom of Information and Protection of Privacy Act* (LA FOIP). The Applicant asked the Commissioner to review the City's decision and its search efforts. As the City released additional records, it dropped its reliance on subsection 14(1)(m) of LA FOIP, and so this provision was no longer under review. The A/Commissioner agreed that some of the records the City identified as not responsive were not responsive, but that other records were. The A/Commissioner recommended the City release to the Applicant within 30 days of the issuance of this Report any records deemed not responsive subject to any exemptions found to apply. The A/Commissioner found the City properly applied subsection 13(1)(b) of LA FOIP to some portions of the records, but not to others, and that it properly applied subsection 28(1) of LA FOIP. The A/Commissioner also found the City did not demonstrate pursuant to section 51 of LA FOIP that subsections 16(1)(a) and (b) of LA FOIP apply. The A/Commissioner outlined his recommendations for continuing to withhold or for releasing records in the Appendix to this Report. Where he recommended release, he recommended the City do so within 30 days of the issuance of this Report. Finally, the A/Commissioner found the City's search efforts were reasonable, but that it did not respond completely to the applicant when it omitted records from its response. The A/Commissioner recommended that when responding to an access to information request, the City adopt the practice of asking Applicants if they wish to receive duplicate records or not. The A/Commissioner also recommended, as he had in Review Report 177-2023 also concerning the City, that the City continue to ensure it provide its staff with regular training on its records management and retention policies to ensure that proper record keeping occurs.

I BACKGROUND

[1] On October 31, 2023, the City of Saskatoon (City) received the following access to information request from the Applicant:

‘any and all emails’ including Mayor Charlie Clark related to the Community Safety and Well-Being (CSWB) Exec, for the period January 1, 2020 through present

[2] By email dated November 29, 2023, the City extended its time to respond pursuant to section 12 of *The Local Authority Freedom of Information and Protection of Privacy Act* (LA FOIP). The City then provided its section 7 decision to the Applicant on December 7, 2023. The City advised it was withholding the record, in part, pursuant to subsections 13(1)(b), 14(1)(m), 16(1)(a), (b) and 28(1) of LA FOIP.

[3] On January 18, 2024, the Applicant asked my office to undertake a review. My office notified the Applicant and the City of the review on February 22, 2024. The issues identified included a review of the City’s decision to deny access to portions of the record pursuant to subsections 13(1)(b), 14(1)(m), 16(1)(a), (b) and 28(1) of LA FOIP, and its search efforts.

[4] On March 25, 2024, the City advised my office that it had located an additional responsive record during the review, which it disclosed to the Applicant.

[5] On April 18, 2024, the City provided the Applicant with an updated package of records in which it removed redactions and released additional information. This resulted in the City no longer relying on subsection 14(1)(m) of LA FOIP.

[6] On April 23, 2024, the City provided its submission. The Applicant provided comments and supporting documentation throughout the review.

II RECORDS AT ISSUE

[7] There are 144 pages at issue as outlined in the Appendix, along with my recommendations. Under review are the City’s reliance on subsections 13(1)(b), 16(1)(a), (b) and 28(1) of LA FOIP to withhold portions of the record.

III DISCUSSION OF THE ISSUES

1. Do I have jurisdiction?

[8] The City is a “local authority” pursuant to subsection 2(1)(f)(i) of LA FOIP; therefore, I have jurisdiction.

2. Are there records that are not responsive?

[9] When a local authority 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. It follows that any information or records that do not reasonably relate to an applicant’s request will be considered “not responsive.” An applicant’s access to information request sets out the boundaries of relevancy. 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 LA FOIP is best served when a local authority adopts a liberal interpretation of a request (*Guide to LA FOIP*, Chapter 3, “Access to Records”, updated May 5, 2023 [*Guide to LA FOIP*, Ch. 3], pp. 26-27).

[10] The City identified an additional 49 pages that it deemed as being not responsive to the Applicant’s access request. The City submits as follows:

A set of records were deemed to be unresponsive to the request. There were three reasons for unresponsiveness. First, some emails were deemed unresponsive because they did not include Charlie Clark. Second, some emails were deemed unresponsive because the portion of the email chain involving Charlie Clark was disclosed in other records. Third, one record was deemed unresponsive because it was not an email nor attached to an email.

[11] In this matter, the Applicant set the parameters as emails including the mayor relating to the Community Safety and Well-Being (CSWB) executive.

- [12] Upon review, I find that the emails not including Charlie Clark relating to the CSWB executive are not responsive (pages 1 to 8, 11, 12, 17 to 23, and 33 to 48). I also find that the one page that is neither an email nor an attachment to an email (page 49) is also not responsive. In my blog, [What About the Responsive Record?](#), I state that public bodies should disclose not responsive records or information subject to any exemptions found to apply. I recommend, then, that the City release pages 1 to 8, 11, 12, 17 to 23, and 33 to 49 of the not responsive records to the Applicant, subject to any exemptions found to apply, within 30 days of the issuance of this Report.
- [13] The City stated it also removed portions of the record that contained duplicate information in its process of “de-duplication” (pages 9, 10, 13 to 10, and 24 to 32). This is the process of removing duplicate records or information when processing an access request. Local authorities may do this to reduce associated work or costs for applicants (e.g., to reduce costs for reproduction). Duplicate records, however, are still responsive. I find, then, that the duplicate records or information contained in the not responsive records are responsive. I recommend the City release pages 9, 10, 13 to 10, and 24 to 32 of the not responsive records to the Applicant, subject to the exemptions found to apply, within 30 days of the issuance of this Report.
- [14] As an aside, where a local authority encounters duplicate records or information, the best practice is to ask the applicant if they wish to receive them; some applicants may want them, regardless of issues like cost. I speak to this a bit more in the section concerning the City’s search efforts.
- [15] I add that the City also claims that pages 346 to 367 (within the records provided to the Applicant as indicated in the Appendix) are not responsive to the Applicant’s access request. The City’s submits that these portions are “out of scope” and were, “created by a different local authority, the Saskatoon Police...”. The City further submits it, “does not exert any measure of control over this record.” This is not a relevant consideration as to whether or not records are responsive to an access to information request. The right of access is to any record in the local authority’s possession or control, and so if they are relevant to the access request, then they are responsive. The Saskatoon Police Service (SPS)

attached the slides to an email on page 344 (timestamped June 7, 2023, at 9:46:46 am), and so I find they are responsive to the Applicant's access request.

[16] Upon review, however, these pages appear to be a PowerPoint presentation created by the Government of Saskatchewan (GOS), and not the SPS as the City submits. SPS may have supplied the slides to the City, but the originator appears to be the GOS given the slides use the GOS visual identity and have the GOS website address on them. Since subsection 13(1)(b) of LA FOIP can apply to information that was received indirectly from the GOS, subsection 13(1)(b) of LA FOIP can be found to apply if the GOS was the original source, along with other considerations (*Guide to LA FOIP*, Chapter 4, "Exemptions from the Right of Access", updated October 18, 2023 [*Guide to LA FOIP*, Ch. 4], p. 22). I will determine, then, if subsection 13(1)(b) of LA FOIP, as a mandatory exemption, would apply to these pages in the next part of this Report.

3. Did the City properly apply subsection 13(1)(b) of FOIP?

[17] The City applied subsection 13(1)(b) of LA FOIP as outlined in the Appendix. Subsection 13(1)(b) of LA FOIP provides as follows:

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 Saskatchewan or a government institution;

[18] Subsection 13(1)(b) of LA 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 the GOS or a government institution unless there is consent to release or the information was made public. It includes the agencies, Crown corporations and other institutions of the Government of Saskatchewan (*Guide to LA FOIP*, Ch. 4, p. 13). My office uses the following two-part test to determine if a local authority properly applied this provision:

1. Was the information obtained from the Government of Saskatchewan or its agencies, Crown corporations or other institutions?
2. Was the information obtained implicitly or explicitly in confidence?

[19] Where it is relying on this provision, the City submits that the information was obtained indirectly from GOS and involves information such as funding considerations between the GOS and third-party service providers. The City states that the information was provided implicitly in confidence. The *Guide to LA FOIP*, Ch. 4, pp. 26-27, offers the following definitions:

- “Obtained” means to acquire in any way; to get possession of; to procure; or to get a hold of by effort. A local authority could obtain information either intentionally or unintentionally. It can also include information that was received indirectly provided its original source was the Government of Saskatchewan. However, to obtain information suggests that the local authority 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. Section 13 of LA 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 local authority provided the information at issue was obtained from the Government of Saskatchewan.
- “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. For confidence to be found, there must be an implicit or explicit agreement or understanding of confidentiality on the part of both the local authority 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 local authority 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.
- “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. Factors to consider

include determining what the nature of the information is and if a reasonable person would normally expect the information to be kept confidential.

[20] Where it applied this exemption, the City submits as follows:

In the records package, section 13(1)(b) of LAFOIP is used regularly. The City of Saskatoon used this exemption for information received in confidence from the Government of Saskatchewan, whether directly or indirectly. The City of Saskatoon also used this exemption for information received in confidence from the Saskatoon Tribal Council, whether directly or indirectly. The Saskatoon Tribal Council's governing body is made up of seven First Nations communities and is founded on the sovereignty and self-governance of its First Nations. STC works collaboratively with the City of Saskatoon, Federal and Provincial governments, school boards and privacy industry. The City of Saskatoon considers the Saskatoon Tribal Council as a government body.

[21] *The Freedom of Information and Protection of Privacy Act* (FOIP) and *The Freedom of Information and Protection of Privacy Regulations* (FOIP Regulations) are prescriptive in what entities qualify as "government institutions". Neither FOIP nor the FOIP Regulations include the Saskatoon Tribal Council (STC) as a "government institution", and so that needs to factor into my review of subsection 13(1)(b) of LA FOIP. I also note that in the record, it appears there are mainly references to the Ministry of Social Services (Social Services), which is a "government institution" pursuant to subsection 2(1)(d)(i) of FOIP.

[22] Upon review of the record where the City is relying on subsection 13(1)(b) of LA FOIP, I am not satisfied that both parts of the test are met for the following, and so find that the City did not properly apply subsection 13(1)(b) of LA FOIP to these pages:

- Page 64, redaction 1 – portions released to the Applicant indicate this withheld information is about "Refugees". It appears the information was shared amongst City officials after a CWSB executive meeting. The City states the information was obtained indirectly from the GOS, but it's not apparent how it was obtained from the GOS and not from other sources. This information is duplicated again (or the portion of this email is) at other places in the record, such as the first redactions on pages 78, 80 (onto page 81) and 605.
- Page 247 – portions released to the Applicant disclose that the withheld information is part of an email referring to "CSWB Exec meeting agenda." The withheld portion includes information that may have been obtained from Social Services, but it is also information that appears to be publicly known, and so would not be confidential.

- Page 308 – portions released to the Applicant disclose that the withheld information is part of a “Saweyihtotan status update.” It is not clear if any portion of the withheld information would have been obtained from the GOS (or Social Services). There is also information that appears to have been obtained from STC, which as I noted earlier is not a government institution under FOIP or its Regulations. This information is duplicated on page 473.
- Page 424 – portions released to the Applicant indicated the withheld portion relates to “Saweyihtotan”, which is an initiative of the STC. It appears that the information was obtained from the STC, which is not a government institution under FOIP or its Regulations.
- Page 452, redaction 1 (continued on page 453) – portions released to the Applicant indicate the withheld portion relates to “Saweyihtotan”, which is an initiative of the STC. It appears that the information was obtained from the STC, which is not a government institution under FOIP or its Regulations. The information is duplicated on page 463 (carried onto page 464).
- Page 576 (redaction 1) – portions released to the Applicant disclose that this portion contains information on, “Drug Task Force.” It is not clear how this information was obtained from the GOS (or Social Services). Redaction 2 on this page contains information that appears to have come from STC, which is not a government institution under FOIP or its Regulations; the information is duplicated on page 610.

[23] As I have no other exemptions to review on the above, I recommend the City release the portions of the pages described in the preceding paragraph to the Applicant within 30 days of the issuance of this Report. See the Appendix.

[24] For the remaining portions of the record where the City applied subsection 13(1)(b) of LA FOIP, I am satisfied that both parts of the test are met for the following pages, and find that the City properly applied subsection 13(1)(b) of LA FOIP to these pages as follows:

- Page 106 (but not the portion on page 107) – portions released to the Applicant indicate the withheld portion refers to “Saweyihtotan next steps.” The withheld portions of the emails contain information that would have been supplied incidentally by Social Services to the City and is information that would be used in internal decision making. Confidentiality would then be expected or implicit. This information is duplicated on pages 112 (but not onto 113), 122, 599 and 600.
- Page 155, redaction 1 – portions of this email released to the Applicant disclose this withheld information is about, “Downtown Safety and SIS program advocacy

related to increasing homelessness”. The email summarizes what was discussed at the meeting. There is information, such as statistics, supplied by Social Services that would be internal to its own workings or business and its own internal decision making that would reasonably be considered confidential. As such, confidentiality would be expected or implicit. This information is duplicated at redaction 1 on page 517, redaction 1 at page 536, and redaction 1 at page 548.

- Page 156, redaction 2 – this is a summary of the executive committee meeting that is continued in the email from page 155. Portions released to the Applicant disclose this information is about “Saweyihtotan proposal for Treasury Board.” There is information that contains what Social Services proposed to Treasury Board and other actions it took. It appears Social Services supplied this information to the City. A reasonable person would expect the information to be confidential. This information is duplicated at page 518, 537 and 549.

[25] I recommend the City continue to withhold the pages described in the preceding paragraph pursuant to subsection 13(1)(b) of LA FOIP. See the Appendix.

[26] Regarding pages 346 to 367, I stated earlier that these pages are a PowerPoint presentation that appears to have been created by the GOS. The City acquired it from the SPS; earlier I stated that as it’s in the City’s possession or control, it is relevant and responsive. Contents on the slides state that the information was included for internal planning, likely to advise different local authorities or organizations on what planning the GOS was undertaking. There’s no written indication on the slides that the information is intended to be confidential. In its covering email, the SPS also didn’t advise the City that it was providing the slides in confidence when it forwarded them to the City. Some of the information could be considered publicly known or available. While the GOS appears to be the originator, it is not clear that the GOS shared it in confidence, either explicitly or implicitly. Therefore, I find that subsection 13(1)(b) of LA FOIP does not apply to pages 346 to 367 and recommend the City release these pages to the Applicant subject to any exemptions that may apply within 30 days of the issuance of this Report. See the Appendix.

4. Did the City properly apply subsection 28(1) of LA FOIP?

[27] The City is relying on subsection 28(1) of LA FOIP as outlined in the Appendix. I note that on its index and in its submission, the City stated that some information can be withheld

pursuant to subsection 23(1) of LA FOIP. If the information can be defined as “personal information” pursuant to subsection 23(1) of LA FOIP, then a local authority would properly withhold it pursuant to subsection 28(1) of LA FOIP. I continue my review on this basis. Subsection 28(1) of LA FOIP provides as follows:

28(1) No local authority 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 29.

[28] Section 28 of LA FOIP prohibits the disclosure of personal information unless the individual about whom the information pertains consents to its disclosure or if disclosure without consent is authorized by one of the enumerated subsections of 28(2) or section 29 of LA FOIP (*Guide to LA FOIP*, Chapter 6, “Protection of Privacy”, updated February 27, 2023 [*Guide to LA FOIP*, Ch. 6], p. 163).

[29] Section 28 of LA FOIP only applies to personal information as defined by section 23 of LA FOIP, although the list provided at section 23 is not exhaustive. To constitute personal information, the *Guide to LA FOIP*, Ch. 3 at pages 39 to 41, states that two elements must be present:

1. The information must be about an identifiable individual. This means the individual can be identified by the information (e.g., their name or where they live) or the information, in combination with otherwise available information, could reasonably allow the individual to be identified. “Identifiable” means it must be reasonable to expect that the individual may be identified if the information is disclosed. An “individual” means natural persons or human beings.
2. The information must be personal in nature. This means that the information would reveal something personal about the identifiable person. “Personal” means of, affecting or belonging to a particular person, or concerning a person’s private rather than public life.

[30] In its index (and submission), the City stated there is personal information involved in certain portions of the record that relates to individuals (other than the Applicant) and their employment history. In other places, the City asserts there is personal information in the form of opinions about individuals made by other individuals. Upon review of the record, I note some examples in the paragraphs that follow.

[31] On page 164, redaction 1, the name of an individual and the status of their employment is included. This information is repeated on other pages, such as at the first and second redaction on page 168 and again at redaction 1 on page 169. The second redactions on pages 169 and 170, reveal the reasons for the status. At pages 428 to 432, there is a copy of a cover letter and resume in which an individual (not the Applicant) outlines their education and employment history and includes other details such as their personal contact information. Such information is “personal information” as defined by subsections 23(1)(b) and (e) 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;

...

(e) the home or business address, home or business telephone number, fingerprints or blood type of the individual;

[32] On page 238, redaction 1 contains an opinion that a City official had about a particular individual who is not the Applicant. Redaction 1 on page 513 contains a similar type of information containing opinions made by a City official about an individual who is not the Applicant. This is personal information as defined by subsection 23(1)(h) 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:

...

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

[33] Based on the preceding, I find there is personal information as defined by subsections 23(1)(b), (e) and (h) of LA FOIP, and that the City properly applied subsection 28(1) of LA FOIP to this information. I recommend the City continue withholding this information pursuant to subsection 28(1) of LA FOIP.

[34] There are some portions of the record where the City applied subsection 16(1)(b) of LA FOIP alongside subsection 28(1) of LA FOIP. As the City can continue withholding those portions pursuant to subsection 28(1) of LA FOIP, I do not need to consider those portions under subsection 16(1)(b) of LA FOIP. See the Appendix.

5. Did the City properly apply subsection 16(1)(a) of LA FOIP?

[35] The City is relying on subsection 16(1)(a) of LA FOIP as outlined in the Appendix. Subsection 16(1)(a) of LA FOIP provides as follows:

16(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 the local authority;

[36] Subsection 16(1)(a) of LA FOIP is a discretionary class-based exemption. It permits refusal of access in situations where release of a record could reasonably be expected to disclose advice, proposals, recommendations, analyses or policy options developed by or for a local authority (*Guide to LA FOIP*, Ch. 4, p. 107). My office applies the following two-part test to determine if a local authority properly applied this provision:

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 the local authority?

[37] The City stated that the portions of the record where it is relying on subsection 16(1)(a) of LA FOIP invariably contain advice, recommendations, proposals, analysis and policy options. The *Guide to LA FOIP*, Ch. 4 at pages 108 and 109, offers these 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. 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.

- A “recommendation” is a specific piece of advice about what to do, especially when given officially; it is a suggestion that someone should choose a particular thing or person that one thinks particularly good or meritorious. Recommendations relate to a suggested course of action more explicitly and pointedly than “advice”. It can include material that relates to a suggested course of action that will ultimately be accepted or rejected by the person being advised.
- 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.

[38] For the second part of the test, records should be developed “by or for” the local authority. The *Guide to LA FOIP*, Ch. 4, p. 110, provides the following definition:

- “Developed by or for” means the advice, proposals, recommendations, analyses and/or policy options must have been created either: 1) within the local authority, or 2) outside the local authority but for the local authority (for example, by a service provider or stakeholder). For information to be developed by or for a local authority, the person developing the information should be an official, officer or employee of the local authority, be contracted to perform services, be specifically engaged in an advisory role (even if not paid) or otherwise have a sufficient connection to the local authority. Any advice, proposals, recommendations, analyses or policy options should:
 - Be either sought, be expected, or be part of the responsibility of the person who prepared the record.
 - Be prepared for the purpose of doing something, such as taking an action or making a decision.
 - Involve or be intended for someone who can take or implement the action.

[39] Where it applied this exemption, the City stated the information, as per the Applicant's access request, was created by or for the CSWB executive committee. The City provided some documentation to my office regarding the CSWB and its composition. The City stated that the CSWB is not a committee of the City, and that the executive committee is made up of a partnership of various agencies. A search of the City [website](#) offers the following information, which confirms what the City submits:

...

The Alliance is an inter-sectoral collaboration of 35 agencies with expertise, experience and interest in addressing issues related to safety and well-being in Saskatoon. Administrative oversight is provided by its four funders: Saskatchewan Health Authority; Saskatoon Police Service; Saskatoon Tribal Council, and the City.

The CSWB Partnership works to address root causes of complex social and community well-being issues through policy, funding, and system changes. Partnership membership is comprised of the: Mayor's Office, Saskatoon Fire Department, Saskatoon Police Service, Saskatoon Tribal Council, Central Urban Métis Federation Inc., Saskatchewan Health Authority, University of Saskatchewan, Saskatchewan Polytechnic, Saskatchewan Indian Institute of Technologies and participation from provincial ministries when needed.

Community safety and wellbeing initiatives have shown to reduce crime, improve public perceptions of quality of life and safety and reduce discrimination and racism leading to population growth, increased migration rates, and demographic diversity, all of which benefit the city's general economy.

[40] In composition, the CSWB appears to be a steering or advocacy committee involving various partner organizations including the City. It is not a committee of the City, then, but a committee in which the City is a partner or participates. City officers, as the City states, are part of the committee. Although portions of the records would technically contain advice, recommendations, etc., it appears that it would have been created by or for the CSWB, which doesn't meet the second part of the test. If it was created by or for the City, the City needed to demonstrate how, pursuant to section 51 of LA FOIP, which provides as follows:

51 In any proceeding pursuant to this Act, the burden of establishing that access to the record applied for may or must be refused or granted is on the head concerned.

[41] As such, I find that pursuant to section 51 of LA FOIP, the City has not demonstrated that subsection 16(1)(a) of LA FOIP applies. As the City also applied subsection 16(1)(b)

alongside some of the same portions where it applied subsection 16(1)(a) of LA FOIP, I will first consider subsection 16(1)(b) of LA FOIP prior to making any recommendations.

6. Did the City properly apply subsection 16(1)(b) of LA FOIP?

[42] The City applied subsection 16(1)(b) of LA FOIP as outlined in the Appendix. Subsection 16(1)(b) of LA FOIP provides as follows:

16(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 officers or employees of the local authority;

[43] Subsection 16(1)(b) of LA 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 local authority. The provision is intended to allow persons having the responsibility to make decisions to freely discuss the issues before them 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 (*Guide to LA FOIP*, Ch. 4, p. 114). My office uses the following two-part test to determine if local authorities properly applied this provision:

1. Does the record contain consultations or deliberations?
2. Do the consultations or deliberations involve officers or employees of the local authority?

[44] The City claims that portions of the records contain both consultations or deliberations, and that others contain consultations. This includes, among other arguments, consultations and deliberations about hiring individuals, and items on documents such as agendas that would reveal the substance of a deliberation and budget discussions on how to allocate funds. The City adds these deliberations and/or consultations involved officers or employees of the City. The *Guide to LA FOIP*, Ch. 4 at pages 115 to 117, offers the following definitions:

- “Consultation means” the act of consulting or taking counsel together, or a deliberation or conference in which the parties consult and deliberate. A consultation can occur when the views of one or more officers or employees of a local authority are sought as to the appropriateness of a particular proposal or suggested action. It can include consultations about prospective future actions and outcomes in response to a developing situation. It can also include past courses of action. For example, where an employer is considering what to do with an employee in the future, what has been done in the past can be summarized and would qualify as part of the consultation or deliberation.
- “Deliberation” means the act of deliberating (to deliberate: to weigh in mind; to consider carefully with a view to a decision; to think over). It is the careful consideration with a view to a decision, and the consideration and discussions of the reasons for and against a measure by several councillors. A deliberation can occur when there is a discussion or consideration of the reasons for or against an action. It can refer to discussions conducted with a view towards making a decision.
- “Involving” means including. There is nothing in the exemption that limits the exemption to participation only of officers or employees of a local authority. Collaboration with others is consistent with the concept of consultation.
- “Officers or employees of a local authority” means an individual employed by a local authority and includes an individual retained under a contract to perform services for the local authority.

[45] The exemption does not generally apply to records or parts of records that in themselves reveal only that a consultation or deliberation took place at a particular time, that particular persons were involved; or that a particular topic was involved. The exemption may cover instances where information reveals the substance of the consultations or deliberations (e.g., if disclosed, the information would permit the drawing of accurate inferences as to the nature of the consultations or deliberations) (*Guide to LA FOIP*, Ch. 4, p. 117).

[46] Subsection 16(1)(b) of LA FOIP regards the protection of the decision-making process. There needs to be a decision and a decision maker. If local authority officials or employees are involved in an advisory role in the decision-making process, then their roles need to be clearly understood. When relying on subsection 16(1)(b) of LA FOIP, a local authority needs to clearly lay all this out. In this matter, while there may be what can be considered consultations or deliberations occurring, they appear to be occurring by or for the CSWB,

and not by or for the City as is required by the second part of the test. If this is not the case, then I require more clarity from the City pursuant to section 51 of LA FOIP. I find, then, that pursuant to section 51 of LA FOIP, the City has not demonstrated that subsection 16(1)(b) of LA FOIP applies.

[47] As I find that the City has not demonstrated that either subsection 16(1)(a) or (b) of LA FOIP apply, I recommend it release to the Applicant the portions where it applied these exemptions within 30 days of the issuance of this Report.

7. Were the City's search efforts reasonable?

[48] In this matter, the Applicant has a couple concerns related to the City's search efforts. First, the Applicant raised the matter of two emails (contained on three pages) they believed should have been included with their access request as they were included as responsive in a different access request made by someone else [Applicant B] as follows:

Originally we [Applicant and Applicant B] went through two requests directly to the Mayor's office for specific records to a simple search.

We did not receive the full records sought as we knew of other records, created by the Mayor's Office, that we have already gleaned from other sources which originated from the Mayor's Office but yet they were not disclosing them to our legal requests.

...

Now we have made the exact same request of Mayor Clark directly.

To this we find the following:

Both emails included should have been returned by Mayor Clark to this legal request. Both originated from his own Mayor's Office and copied him directly in the correspondence. One of the documents the Mayor's Office themselves did not return and it was legally returned by the Fire Chief's LAFOIP even though the Mayor's Office created it.

[49] The Applicant also cited apparent discrepancies in the City's responses to other access requests, including those to Applicant B, involving omitted records. The Applicant outlined their concern as wanting my office to, "consider that this elected official [Charlie Clark] is not properly keeping records related to public business." The Applicant added, "it is my

view that the City of Saskatoon should have a complete communication record throughout for official business.” I dealt with a similar question about the City’s search efforts in [Review Report 177-2023](#).

[50] What this relates to is the notion that if a local authority makes errors such as omitting records, its search efforts can be questioned, and applicants may wonder if all responsive records have been accounted for. That is, if the local authority missed some records, did it miss others? Reviewing a local authority’s search efforts can help determine if its search efforts were reasonable, and if there are things it can do differently in responding to an access request.

[51] Section 5 of LA FOIP provides as follows:

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

[52] Section 5 of LA FOIP establishes a right of access by any person to records in the possession or control of a local authority subject to limited and specific exemptions, which are set out in LA FOIP (*Guide to LA FOIP*, Ch. 3, p. 3).

[53] Subsection 5.1(1) of LA FOIP requires a local authority to respond to an applicant’s access to information request openly, accurately and completely. This means that local authorities 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 (*Guide to LA FOIP*, Ch. 3, p. 12).

[54] Earlier, I stated that when a local authority makes errors such as missing or omitting records it can bring into question its search efforts. When reviewing a local authority’s search efforts, my office considers if the local authority undertook reasonable efforts to search. A reasonable effort is the level of effort you would expect of any fair, sensible person searching areas where records are likely to be stored. What is reasonable depends on the request and related circumstances. The *Guide to LA FOIP*, Ch. 3 at pages 14 and 15, outline

examples of information a local authority can provide my office to support its search efforts:

- For personal information requests – explain how the individual is involved with the local authority (i.e., client, employee, former employee etc.) and why certain departments/divisions/branches/committees/boards were included in the search.
- For general requests – tie the subject matter of the request to the departments/divisions/branches/committees/boards 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/committees/boards included in the search.
- Describe how records are classified within the records management system. For example, are the records classified by alphabet, year function and/or 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 local authority’s control have been searched such as a contractor or information management service provider.
- Explain how a search of mobile electronic devices was conducted (i.e., laptops, smart phones, cell phones, tablets).
- Explain which folders within the records management system were searched and how these folders link back to the subject matter requested. For electronic folders – indicate what key terms were used to search if applicable.
- Indicate the calendar dates each employee searched.
- Indicate how long the search took for each employee.
- Indicate what the results were for each employee’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.

[55] The above list is meant to be a guide. Each case will require different search strategies and details depending on the records requested.

[56] Regarding its search efforts, on February 2, 2024, the City responded to two questions from my office, which my office shared with the Applicant. The City's responses were as follows:

Question 1: When the Applicant requested the record in question, did you conclude that it was not in the possession of further emails based on your knowledge alone, did you discuss it with others, or did you perform a search to verify that more records did not exist in the City's possession?

Since ATI 185 sought email records involving only the mayor, the application was forwarded to [name redacted], our Integrity Commissioner and External Head, on the same day it was received. See attached email <FW: New ATI 185 Access to Information – 31/10/2023>...

The IT Exchange Administrator completed a pull right from the mayor's mailbox from the Exchange server using the search parameters from ATI 185. See attached email <RE Access to Information Request CK 416-023-185>. The resulting CST file from the IT Exchange pull was provided to [name redacted] for review.

[Name redacted] determined what records were responsive to ATI 185, determined what exemptions were appropriate, and provided the resulting records package to the City of Saskatoon's Access and Privacy Officer for disclosure to the applicant. Of note, there were records responsive to this request that had already been publicly released in relation to a different Access to Information request that were cross-referenced against the new search results on ATI 185.

Question 2: If you did perform a search, what were the specifics of that search? Are you willing to share those details with this office at this stage and allow us to share them with the applicant? If so, our hope would be that this may lead to a reduction in the number of elements under review if the applicant is satisfied with your description of your search efforts.

As indicated, there was a new IT search completed with the search parameters from ATI 185. The specific wording used in the IT Exchange Administrator pull request of Charlie Clark's email was as follows:

- *“CSWB Exec” OR “CSWB Partner Exec” OR “CSWB Partners Exec” OR “CSWB Partners Group Exec” (body and subject) for the dates January 1, 2020 through present*

An IT exchange pull refers to a CST file created directly from the mailbox of the intended subject, in this case Charlie Clark, which includes all emails in their inbox folder, sent folder, deleted folder, draft folder, and any other folders created within their email system. The CST file was provided to [name redacted] in full, and she was able to review all emails and determine responsiveness.

[57] The Applicant was not satisfied with these responses.

[58] In its submission, the City further adds as follows regarding its search efforts:

Because the only records being requested were emails, the Access and Privacy Office determined that an Outlook Exchange search would be the best way to ensure that all responsive emails were located, rather than relying on individual employees to complete a proper search of their mailboxes.

Notes on current email management at the City of Saskatoon:

- Staff are expected to judge how an email should be treated, pursuant to the records management policies, standards, and procedures applicable to them before deleting one.
- Email users cannot rely on the back-up system in place as an archiving or record retention tool, it is only intended to act as a disaster and system recovery tool for that day's emails.
- Procedures and awareness guidelines exist on what constitutes transitory records.
- The search for emails created during the relevant period related to the ATI excluded backup systems, as those records are no longer primary records.
- As the mailbox user manages the retention and disposition of email records, completeness cannot be assured.

Outlook Exchange searches are conducted diligently and in good faith by the City of Saskatoon Exchange Administrator (email system administrator), an experienced staff member in the Information Technology Department. The search utilizes specialized software tools and techniques to gather records.

The Access and Privacy Office initiated the search efforts by submitting an IT support request to query its Outlook system. Specifically, Mayor Charlie Clark's Outlook mailbox was searched for the requested time period with the keywords: *“CSWB Exec” OR “CSWB Partner Exec” OR “CSWB Partners Exec” OR “CSWB Partners Group Exec” (body and subject).*

Of note, keeping in line with the duty to assist provisions in section 5.1(1) of LAFOIP, the Access and Privacy Office utilized broader search terms than what was requested in ATI 185.

- [59] The City stated that it based its search strategy in this matter on the Applicant’s search parameters which were limited to emails, a defined timeframe and a defined subject matter. To search, it then used its “Information Technology Department’s exchange system rather than relying on individuals to provide their responsive emails.” The City added that it cross-checked records provided in response to a different access request (made by a different individual) to verify and validate its response. The City also used expanded search terms, or keywords, to ensure it captured all records. The City is satisfied that these combined steps resulted in a “reasonable and responsive search.”
- [60] Upon review, the Applicant did have clear search parameters by stipulating only emails within a certain timeframe involving a certain subject. As such, the City only needed to search emails within the given parameters, which it did from its exchange system using its expanded search terms. Again, the standard is not perfection, it is what is reasonable in the circumstances. The City’s search steps appear reasonable in the circumstances, and so I find its search was reasonable.
- [61] Earlier, however, I mentioned two emails the Applicant brought forward that they believed the City omitted in its response. The City disclosed the first email to the Applicant on March 25, 2024, realizing it had omitted the email in its de-duplication process. By email to my office on August 20, 2024, the City acknowledged that there was an apparent clerical error in not flagging the second email as responsive. The City apologized for the second error, noting that it “did not intentionally withhold the record in question.” I would characterize both errors as clerical in nature and that, overall, the margin of error was quite low (3 pages out of over 600 pages). This resulted, however, in the City not responding completely to the Applicant’s access request, which means to respond by including every element, without omissions or deficiencies, or with all its parts or in its entirety (*Guide to LA FOIP*, Ch. 3, p. 32). As such, I find the City did not respond completely to the Applicant when it omitted the emails.

[62] It appears, then, that where the City fell short was in making clerical errors. Had the City asked the Applicant if they wanted duplicates removed, for example, it may have at least prevented the City from inadvertently removing the one email. Local authorities should ask applicants if they want duplicates as they are responsive, and because applicants may want them, regardless of factors such as potential associated costs. In Review Report 177-2023, clerical errors and the City's records management practices were also the issue under consideration. In that report, I recommended the City ensure it provides its staff regular training on its records management and retention policies to ensure that proper record keeping occurs. I continue that recommendation here. I also recommend that the City adopt the practice of asking applicants if they want duplicate records removed.

IV FINDINGS

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

[64] I find that pages 1 to 8, 11, 12, 17 to 23, and 33 to 49 of the not responsive records are not responsive.

[65] I find that pages 9, 10, 13 to 10, and 24 to 32 (or the duplicate records) the City identified as not responsive are responsive.

[66] I find that pages 346 to 367 of the record, which the City deemed in its response to the Applicant as not responsive, are responsive.

[67] I find the City properly applied subsections 13(1)(b) of LA FOIP to some portions of the record, but not to others.

[68] I find the City properly applied subsection 28(1) of LA FOIP.

[69] I find the City did not demonstrate pursuant to section 51 of LA FOIP that subsections 16(1)(a) and (b) of LA FOIP apply.

[70] I find the City's search efforts were reasonable.

[71] I find the City did not respond completely when it omitted two emails from its response to the Applicant.

V RECOMMENDATIONS

[72] I recommend the City release to the Applicant pages 1 to 49 of the records it deemed as not responsive, subject to any exemptions that apply, within 30 days of the issuance of this Report.

[73] I recommend the City continue to withhold or to release records to the Applicant (within 30 days of the issuance of this Report) as outlined in the Appendix.

[74] I continue my recommendation from Review Report 177-2023 that the City provide its staff with regular training on its records management and retention policies to ensure that proper record keeping occurs.

[75] I recommend that when responding to an access to information request, the City adopt the practice of asking Applicants if they wish to receive duplicate records.

Dated at Regina, in the Province of Saskatchewan, this 6th day of September, 2024.

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

Appendix

Page #	Severance #	LA FOIP Exemption Applied	Description	Recommendation
64	1	13(1)(b)	Email	Release
78	1	13(1)(b)	Email (duplicate to p. 64)	Release
80	1	13(1)(b)	Email	Release
81	1	13(1)(b)	Email (continuation of page 80)	Release
106	1	16(1)(b)	Meeting notes	Release
	2	16(1)(b)	Meeting notes	Release
	3	13(1)(b) 16(1)(b)	Meeting notes	Withhold pursuant to subsection 13(1)(b) of LA FOIP
107	1	13(1)(b) 16(1)(b)	Meeting notes (continuation of page 106)	Withhold pursuant to subsection 13(1)(b) of LA FOIP
112	1	16(1)(b)	Meeting notes	Release
	2	16(1)(b)	Meeting notes	Release
	6	13(1)(b)	Meeting notes (duplicate to page 106, redaction 3)	Withhold pursuant to subsection 13(1)(b) of LA FOIP
113	1	13(1)(b)	Meeting notes (continuation of page 112, redaction 6)	Withhold pursuant to subsection 13(1)(b) of LA FOIP
119	1	16(1)(b)	Meeting agenda	Release
122	1	13(1)(b)	Meeting notes	Withhold pursuant to subsection 13(1)(b) of LA FOIP
129	1	16(1)(a), (b)	Briefing note	Release
138	1	16(1)(b)	Email	Release
143	1	16(1)(b)	Email	Release
144	1	16(1)(b)	Email	Release
155	1	13(1)(b)	Meeting notes	Withhold pursuant to subsection 13(1)(b) of LA FOIP
156	1	16(1)(b)	Meeting notes	Release
	2	13(1)(b)	Meeting notes	Withhold pursuant to subsection 13(1)(b) of LA FOIP
157	1	13(1)(b)	Meeting notes	Withhold pursuant to subsection 13(1)(b) of LA FOIP
	2	28(1)	Meeting notes	Withhold pursuant to subsection 28(1) of LA FOIP
159	1	16(1)(b)	Briefing note	Release
160	1	16(1)(b)	Briefing note	Release
	2	16(1)(a), (b)	Briefing note	Release
163	1	16(1)(b)	Draft letter	Release

164	1	28(1)	Email	Withhold pursuant to subsection 28(1) of LA FOIP
168	1	28(1)	Email	Withhold pursuant to subsection 28(1) of LA FOIP
	2	28(1)	Email	Withhold pursuant to subsection 28(1) of LA FOIP
169	1	28(1)	Email	Withhold pursuant to subsection 28(1) of LA FOIP
	2	16(1)(b), 28(1)	Email	Withhold pursuant to subsection 28(1) of LA FOIP
170	1	16(1)(b), 28(1)	Email	Withhold pursuant to subsection 28(1) of LA FOIP
171	1	28(1)	Email	Withhold pursuant to subsection 28(1) of LA FOIP
172	1	28(1)	Letter	Withhold pursuant to subsection 28(1) of LA FOIP
173	1	28(1)	Letter	Withhold pursuant to subsection 28(1) of LA FOIP
238	1	16(1)(b), 23(1) [28(1)]	Email	Withhold pursuant to subsection 28(1) of LA FOIP
245	1	16(1)(a), (b)	Email	Release
	2	16(1)(a), (b)	Email	Release
246	1	16(1)(a), (b)	Email	Release
247	1	13(1)(b)	Email	Release
256	1	16(1)(b)	Email	Release
258	1	16(1)(b)	Email	Release
259	1	16(1)(b)	Email	Release
260	1	16(1)(b)	Email	Release
263	1	16(1)(b)	Email	Release
264	1	16(1)(b)	Email	Release
265	1	16(1)(b)	Email	Release
287	1	16(1)(a), (b)	Email	Release
289	1	16(1)(b)	Meeting notes	Release
290	1	16(1)(b)	Meeting notes	Release
298	1	16(1)(b)	Email	Release
299	1	16(1)(b)	Email	Release
308	1	13(1)(b)	Meeting notes	Release
346 to 367		Non- responsive	Email attachments	Release
369	1	16(1)(b)	Email	Release
370	1	16(1)(b)	Incident action plan	Release
371	1	16(1)(b)	Incident action plan	Release
372	1	16(1)(b)	Incident action plan	Release
376	1	16(1)(a), (b)	Email	Release

378	1	16(1)(a), (b)	Email	Release
379	1	16(1)(a), (b)	Email	Release
380	1	16(1)(b)	Meeting notes	Release
381	1	16(1)(b)	Meeting notes	Release
386	1	16(1)(a), (b)	Email	Release
396	1	16(1)(b)	Email	Release
	2	16(1)(b)	Email	Release
397	1	16(1)(b)	Email	Release
398	1	16(1)(b)	Email	Release
	2	16(1)(b)	Email	Release
399	2	16(1)(b)	Email	Release
400	1	16(1)(b)	Email	Release
403	1	16(1)(a), (b)	Email	Release
405	1	16(1)(b)	Meeting notes	Release
406	1	16(1)(b)	Meeting notes	Release
414	2	16(1)(b)	Email	Release
	3	16(1)(b)	Email	Release
	4	16(1)(b)	Email	Release
424	1	13(1)(b)	Meeting notes	Withhold pursuant to subsection 13(1)(b) of LA FOIP
425	1	16(1)(b)	Email	Release
426	1	28(1)	Email	Withhold pursuant to subsection 28(1) of LA FOIP
	2	16(1)(a), (b)	Email	Release
427	1	28(1)	Email	Withhold pursuant to subsection 28(1) of LA FOIP
428	1	28(1)	Email attachment	Withhold pursuant to subsection 28(1) of LA FOIP
429	1	28(1)	Email attachment	Withhold pursuant to subsection 28(1) of LA FOIP
430	1	28(1)	Email attachment	Withhold pursuant to subsection 28(1) of LA FOIP
431	1	28(1)	Email attachment	Withhold pursuant to subsection 28(1) of LA FOIP
432	1	28(1)	Email attachment	Withhold pursuant to subsection 28(1) of LA FOIP
436	1	16(1)(b)	Email	Release
437	1	16(1)(b)	Email	Release
	2	16(1)(b)	Email	Release
438	1	16(1)(b)	Email	Release
448	1	16(1)(b)	Meeting agenda	Release
449	1	16(1)(b)	Meeting agenda	Release
452	1	13(1)(b)	Briefing note	Release
453	1	13(1)(b)	Briefing note (continuation of p. 452)	Release

460	1	16(1)(a), (b)	Email	Release
	2	16(1)(a), (b)	Email	Release
461	1	16(1)(a), (b)	Email	Release
463	1	13(1)(b)	Briefing note	Release
464	1	13(1)(b)	Briefing note	Release
473	1	13(1)(b)	Meeting notes	Release
507	1	16(1)(b)	Email	Release
	2	16(1)(b)	Email	Release
508	1	16(1)(b)	Email	Release
	2	16(1)(b)	Email	Release
510	1	16(1)(b)	Email	Release
511	1	16(1)(b)	Email	Release
513	1	16(1)(b), 23(1)	Email	Withhold pursuant to subsection 28(1) of LA FOIP
	2	16(1)(a), (b)	Email	Release
514	1	23(1) [28(1)]	Email	Withhold pursuant to subsection 28(1) of LA FOIP
	2	16(1)(b), 23(1) [28(1)]	Email	Withhold pursuant to subsection 28(1) of LA FOIP
517	1	13(1)(b)	Meeting notes	Withhold pursuant to subsection 13(1)(b) of LA FOIP
	2	16(1)(b)	Meeting notes	Release
	3	16(1)(b)	Meeting notes	Release
	4	16(1)(b)	Meeting notes	Release
	5	16(1)(b)	Meeting notes	Release
518	1	13(1)(b)	Meeting notes	Withhold pursuant to subsection 13(1)(b) of LA FOIP
	2	28(1)	Meeting notes	Withhold pursuant to subsection 28(1) of LA FOIP
519	1	16(1)(b)	Meeting notes	Release
520	1	16(1)(b)	Meeting notes	Release
	2	16(1)(a), (b)	Meeting notes	Release
522	1	13(1)(b)	Meeting notes	Withhold pursuant to subsection 13(1)(b) of LA FOIP
523	1	13(1)(b)	Meeting notes	Withhold pursuant to subsection 13(1)(b) of LA FOIP
524	1	16(1)(b)	Email	Release
	2	16(1)(b)	Email	Release
525	1	16(1)(b)	Email	Release
529	1	16(1)(b)	Email	Release
	2	16(1)(b)	Email	Release
536	1	13(1)(b)	Meeting notes	Release
537	1	16(1)(b)	Meeting notes	Release
	2	13(1)(b)	Meeting notes	Withhold pursuant to subsection 13(1)(b) of LA FOIP

538	1	28(1)	Meeting notes	Withhold pursuant to subsection 28(1) of LA FOIP
539	1	16(1)(b)	Email	Release
540	1	16(1)(b)	Email	Release
542	1	16(1)(b)	Email	Release
	2	16(1)(b)	Email	Release
543	1	16(1)(b)	Email	Release
548	1	13(1)(b)	Meeting notes	Withhold pursuant to subsection 13(1)(b) of LA FOIP
	2	16(1)(b)	Meeting notes	Release
549	1	16(1)(b)	Meeting notes	Release
	2	13(1)(b)	Meeting notes	Withhold pursuant to subsection 13(1)(b) of LA FOIP
550	1	28(1)	Meeting notes	Withhold pursuant to subsection 28(1) of LA FOIP
576	1	13(1)(b)	Meeting notes (a duplicate page was provided to the Applicant)	Release
	2	13(1)(b)	Meeting notes (a duplicate page was provided to the Applicant)	Release
578	1	16(1)(b)	Email	Release
587	1	16(1)(a), (b)	Email	Release
588	1	16(1)(b)	Email	Release
589	1	16(1)(b)	Email	Release
594	2	16(1)(b)	Email	Release
595	1	16(1)(b)	Email	Release
599	1	13(1)(b)	Meeting notes	Withhold pursuant to subsection 13(1)(b) of LA FOIP
600	1	13(1)(b)	Meeting notes	Withhold pursuant to subsection 13(1)(b) of LA FOIP
601	1	16(1)(b)	Email	Release
605	1	13(1)(b)	Email	Release
609	1	13(1)(b)	Meeting notes	Release
610	1	13(1)(b)	Meeting notes	Release