



## **REVIEW REPORT 038-2021**

### **Village of Albertville**

**July 15, 2022**

**Summary:** The Applicant made an access to information request to the Village of Albertville (Village) for twelve items. The Applicant requested a review by my office as they did not receive a response to the request within 30 days. Once the Commissioner's review began, the Village responded to the request. Through the course of the review, the Applicant requested that my office also look at the issues of whether the Village's response was compliant with section 7 of *The Local Authority Freedom of Information and Protection of Privacy Act* (LA FOIP), if the Village conducted a reasonable search for records and if the Village met its duty to assist the Applicant pursuant to section 5.1 of LA FOIP. Upon review, the Commissioner found the Village did not meet the 30-day timeline pursuant to section 7(2) of LA FOIP. The Commissioner also found the Village's section 7 of LA FOIP response was not compliant for item #7 as it did not address if there were records responsive to this portion of the request. The Commissioner recommended that within 30 days of issuance of this Report that the Village address item #7 of the Applicant's request indicating if there are records responsive to this portion of the request, and if so, provide those records to the Applicant subject to exemptions. The Commissioner found the Village conducted a reasonable search for records responsive to the request. The Commissioner also found the Village met its duty to assist when processing the access to information request. The Commissioner recommended the Village Administrator, Mayor and Council acquire access and privacy training for LA FOIP. Finally, the Commissioner recommended the Village Mayor and Administrator develop a policy and procedure that addresses how it will process and respond to requests in order to be compliant with its access to information obligations under LA FOIP.

### **I BACKGROUND**

[1] The Applicant made the following access to information request to the Village of Albertville (Village) by email on January 15, 2021:

...

1. Policy, procedures, bylaws related to recreational vehicles in the community
2. Noise bylaws
3. Any Documentation, phone records, call logs, emails, text messages that would indicate how many complaints the village has received related to criminal or safety issues in the Village in 2019 and 2020
4. Any Documentation, phone records, call logs, emails, text messages that would indicate how many of these were forwarded to the RCMP in 2020
5. Policy, procedures, bylaws, or agreements related to the use of “enused” [sic] or undeveloped village property – specifically the parcels of land that are “avenue” directly east of my property and the same parcel across the street related to;
  - decanting of agricultural chemicals, spraying out agricultural chemical tanks and operating agricultural machinery
  - activities such as; storing unused vehicles, gardening, placing sheds and green houses
6. Policy, procedure, bylaws, or agreements related to community members using for personal use village equipment such as snow removal, lawn mowers etc
7. Policy, procedure, bylaws related to receiving and actioning community complaints of safety concerns or illegal activity
8. Policy, procedure, bylaws related to the accessing of images stored on the village surveillance system
9. Technical documentation related to the video cameras owned by the village related to duration of storage prior to overwrite
10. Any documentation, emails, text messages (personal or village owned devices), related to persons accessing or requesting to access images stored on the village surveillance system in 2019 and 2020
11. Any documentation, emails, text messages (personal or village devices) to, from or by any village official or agent related to the 3 serious safety issues emailed to the village by [Applicant] on Nov 30 2020
12. Any documentation indicating the current disposition of the above complaints

...

[2] By email on February 16, 2021, the Applicant advised my office they had not received a response to the January 15, 2021 request made to the Village.

[3] There was a lot of back and forth correspondence between the Village, the Applicant and my office between February 16, 2021 and March 25, 2021, regarding this request. By email on March 26, 2021, the Village Administrator responded to the Applicant regarding the 12 items of their request. I will consider specifically the Village’s response later in this Report.

[4] By email on May 5, 2021, the Applicant advised my office they wished to proceed with the review. On May 6, 2021, my office notified the Village and the Applicant that my office would be undertaking a review of the following matters:

- How the Village searched for the requested records.
- Why the Village did not respond within the required timeline pursuant to section 7 of *The Local Authority Freedom of Information and Protection of Privacy Act* (LA FOIP) and whether the Village believed the response provided on February 25, 2021, was compliant with the requirements of section 7 of LA FOIP.
- Whether the Village met the duty to assist pursuant to section 5.1 of LA FOIP.

[5] The notification emails invited both parties to make submissions to my office. The Village provided its submission on July 15, 2021. No submission was received from the Applicant.

## **II RECORDS AT ISSUE**

[6] As this review considers procedural matters, there are no records at issue.

## **III DISCUSSION OF THE ISSUES**

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

[7] The Village is a “local authority” pursuant to section 2(f)(i) of LA FOIP. Therefore, I find I have jurisdiction to conduct this review.

### **2. Was the Village’s response compliant with section 7 of LA FOIP?**

[8] There are two issues I must consider in this review under section 7. First, whether the Village met the 30-day timeline required by section 7(2) of LA FOIP and second, whether the section 7 response sent to the Applicant contained the elements required by section 7 of LA FOIP.

[9] First, I will consider whether the Village met the 30-day timeline. Section 7(2) of LA FOIP requires a local authority to respond to an access to information request within 30 days of receipt. Section 7(2) of LA FOIP provides:

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

[10] On February 16, 2021, the Applicant emailed my office advising they had not received a response to their access to information request emailed to the Village on January 15, 2021. Once my office began its review, the Village did provide a section 7 response to the Applicant on February 25, 2021. As the initial access to information request was received by the Village on January 15, 2021, the 30-day due date was February 15, 2021 (as day 30 fell on a Sunday). It's response, therefore, arrived 10 days late.

[11] As the Village did not respond to the request within 30 days of receiving the access to information request, I find the Village did not meet the 30-day timeline pursuant to section 7(2) of LA FOIP.

[12] I will now look at the issue of whether the elements of the response were compliant with section 7 of LA FOIP.

[13] Sections 7(2) and (3) of LA FOIP outline how a local authority should respond to an access to information request:

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

(a) stating that access to the record or part of it will be given on payment of the prescribed fee and setting out the place where, or manner in which, access will be available;

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

(c) if the record is to be published within 90 days, informing the applicant of that fact and of the approximate date of publication;

(d) stating that access is refused, setting out the reason for the refusal and identifying the specific provision of this Act on which the refusal is based;

(e) stating that access is refused for the reason that the record does not exist;

(f) stating that confirmation or denial of the existence of the record is refused pursuant to subsection (4); or

(g) stating that the request has been disregarded pursuant to section 45.1, and setting out the reason for which the request was disregarded.

(3) A notice given pursuant to subsection (2) is to state that the applicant may request a review by the commissioner within one year after the notice is given.

[14] Sections 7(2) and (3) of LA FOIP require a local authority to include certain elements in its section 7 response to applicants. This includes either providing records or explaining why they cannot be provided and citing one of the reasons under section 7(2) of LA FOIP. All responses must also include a statement that advises applicants of their right to request a review by my office. The requirement is addressed at section 7(3) of LA FOIP (*Guide to LA FOIP*, Chapter 3: “Access to Records”, updated June 29, 2021 [*Guide to LA FOIP*, Ch. 3, p. 26]).

[15] As noted above, there was a lot of back and forth communication between the Applicant, the Village and my office between February 15, 2021 and March 25, 2021. During that time, the Village was responding to portions of the request and answering questions from my office and the Applicant. These initial communications included a request by my office that the Village provide a section 7 response to the Applicant. It did so on February 25, 2021. However, the section 7 response was deficient in several ways including that it did not clarify whether records existed or not. My office requested the Village address this and on March 26, 2021, the Village provided its second attempt at a section 7 response. It is that response that I will assess to determine if it meets the criteria required by sections 7(2) and (3) of LA FOIP.

[16] The Village’s March 26, 2021 response to the Applicant stated the following:

1 and 2 remain the same. There are no bylaws regarding noise or recreational vehicles in the village.

3. There are no documented records regarding phone records, call logs, emails, text messages that would indicate how many complaints the village has received related to criminal or safety issues in the Village in 2019 and 2020. I have not disregarded this request, I have looked and there are none.

4. There are no documented records regarding phone records, call logs, emails, text messages forwarded to the RCMP in 2020. I have not disregarded this request, I have looked and there are none.

5. The village has no documentation on these lands as they are owned by farmers and not part of the village.

6. My answer remains the same. If a resident volunteers to help the village out by doing snow removal or grass mowing for the village, it is greatly appreciated. I will state that only people who have experience with this type of equipment are given permission to use the equipment.

7. As per Policy, procedure, bylaws related to receiving and actioning community complaints of safety concerns or illegal activity? In the Council Procedures Bylaw, part III, 13 (13.5) All administrative reports, communication from the public, requests, or any other material intended for inclusion in a council agenda must be received by the administrator immediately preceding the council meeting. This matter was included on the December 17th, 2020 agenda and emails were attached to the December 17, 2020 minutes. Also, emails were included on the January 25th, 2021 agenda and again emails were attached to the January minutes.

8. There is no Policy, procedure, bylaws related to the accessing of images stored on the village surveillance system.

9. The system is motion censored [sic] and depending on how much activity there has been, will depend on how long the footage will last. There is no set amount of storage that can be calculated.

As per questions 10 and 11

This is to advise you that the record(s) you wish to access do not exist in The Village of Albertville. For your information, this notification has been provided pursuant to clause 7(2)(e) of [LA FOIP].

12. Any copies of the minutes you require can be viewed at the village office or scanned and emailed to you upon request with a fee of \$1.00 per copy for each month requested.

If you would like to exercise your right to request a review of this decision, you may do so by completing a "Request for Review" form and forwarding it to the Saskatchewan Information and Privacy Commissioner within one year of this notice. Your completed form can be sent to #503 – 1801 Hamilton Street, Regina, Saskatchewan, S4P 4B4. This form is available at the same location which you applied

for access or by contacting the Office of the Information and Privacy Commissioner at (306) 787-8350.

***Records Do Not Exist***

[17] Section 7(2)(e) of LA FOIP provides that where records do not exist, a local authority must advise the Applicant in writing of this when it responds to the request. The Village advised the Applicant that there were no records for the following items on March 26, 2021:

Item #1: Policy, procedures, bylaws related to recreational vehicles in the community...

- “There are no bylaws regarding noise or recreational vehicles in the village.”

Item #2: Noise bylaws

- “There are no bylaws regarding noise or recreational vehicles in the village.”

Item #3: Any Documentation, phone records, call logs, emails, text messages that would indicate how many complaints the village has received related to criminal or safety issues in the Village in 2019 and 2020

- “There are no documented records regarding phone records, call logs, emails, text messages that would indicate how many complaints the village has received related to criminal or safety issues in the Village in 2019 and 2020. I have not disregarded this request, I have looked and there are none.”

Item #4: Any Documentation, phone records, call logs, emails, text messages that would indicate how many of these were forwarded to the RCMP in 2020

- “There are no documented records regarding phone records, call logs, emails, text messages forwarded to the RCMP in 2020. I have not disregarded this request, I have looked and there are none.”

Item #5: Policy, procedures, bylaws, or agreements related to the use of “enused” [sic] or undeveloped village property – specifically the parcels of land that are “avenue” directly east of my property and the same parcel across the street related to: a) decanting of agricultural chemicals, spraying out agricultural chemical tanks and operating agricultural machinery; b) activities such as; storing unused vehicles, gardening, placing sheds and green houses

- “The village has no documentation on these lands as they are owned by farmers and not part of the village.”

Item #8: Policy, procedure, bylaws related to the accessing of images stored on the village surveillance system

- “There is no Policy, procedure, bylaws related to the accessing of images stored on the village surveillance system.”

Item #9: Technical documentation related to the video cameras owned by the village related to duration of storage prior to overwrite

- “The system is motion censored [sic] and depending on how much activity there has been, will depend on how long the footage will last. There is no set amount of storage that can be calculated.”

Item #10: Any documentation, emails, text messages (personal or village owned devices), related to persons accessing or requesting to access images stored on the village surveillance system in 2019 and 2020

- “This is to advise you that the record(s) you wish to access do not exist in The Village of Albertville. For your information, this notification has been provided pursuant to clause 7(2)(e) of [LA FOIP].”

Item #11: Any documentation, emails, text messages (personal or village devices) to, from or by any village official or agent related to the 3 serious safety issues emailed to the village by [Applicant] on Nov 30 2020

- “This is to advise you that the record(s) you wish to access do not exist in The Village of Albertville. For your information, this notification has been provided pursuant to clause 7(2)(e) of [LA FOIP].”

[18] In my office’s [Review Report 121-2021](#), I stated:

[77] With respect to the RM’s response that records related to quotes for livestreaming did not exist, the RM was required to explicitly cite section 7(2)(e) of LA FOIP, but did not do so. In the future, it is a good practice that the RM do so.

[19] For items #10 and #11, the Village advised the Applicant that the records do not exist pursuant to section 7(2)(e) of LA FOIP.

[20] As outlined above, the Village also advised the Applicant there were no records for items #1 to #5 and #8.

[21] For item #6, the Applicant requested, “policy, procedure, bylaws, or agreements related to community members using for personal use village equipment such as snow removal, lawn mowers etc.” The Village responded to this item with an answer about the practice and did not advise if records existed or not on March 26, 2021:

My answer remains the same. If a resident volunteers to help the village out by doing snow removal or grass mowing for the village, it is greatly appreciated. I will state that



only people who have experience with this type of equipment are given permission to use the equipment.

- [22] However, on March 3, 2021, the Village responded to item #6 consistent with section 7(2)(e) of LA FOIP:

There are no policy, procedure or Bylaws regarding village equipment. As you know we are a small community which relies on our volunteers to help with a number of community related work projects. If John Doe offers to cut the grass in the village because our part time maintenance person can not keep up for what ever reason, then it has sometimes been agreed by council members to allow John Doe to mow his own grass while out on the machine. This is also the case with ploughing snow. Again this is volunteer work which is covered for liability under the Village of Albertville insurance.

- [23] There was additional back and forth related to the records the Applicant was requesting for item #9. On March 3, 2021, the Applicant clarified, "I would like the actual technical documents that accompany such electronic items to show what they are capable of storing." On March 26, 2021, the Village advised the Applicant, "the system is motion censored [sic] and depending on how much activity there has been, will depend on how long the footage will last. There is no set amount of storage that can be calculated." On April 21, 2021, the Village advised the Applicant, "...there was no technical documentation received with the security cameras." This is consistent with advising the Applicant records do not exist.

- [24] I commend the Village for advising the Applicant that records do not exist pursuant to section 7(2)(e) of LA FOIP for items #10 and #11. Going forward the Village should apply this approach for all cases where records do not exist.

### ***Council Minutes***

- [25] For item #12, the Applicant originally requested, "any documentation indicating the current disposition of the above complaints." The Applicant was referring to items #1 through #11 of their request.

[26] On March 1, 2021, the Village advised the Applicant, “your complaints have been added to the December 2020 and January 2021 minutes and copies of all emails received from you and sent by myself have been attached. Council only meets once per month and the office is only open one day per week.” Through correspondence with my office, the Applicant advised they wanted a copy of the minutes.

[27] As noted above, section 7(2)(b) of LA FOIP requires that, “... if the records requested is published [the head shall give written notice], referring the applicant to the publication.”

[28] In my office’s [Review Report 121-2021](#), I state:

[75] With respect to the RM’s response directing the Applicant to the RM’s website for copies of RM meeting minutes, section 7(2)(b) of LA FOIP requires a local authority to provide such direction ...

[29] On March 26, 2021, the Village advised the Applicant, “any copies of the minutes you require can be viewed at the village office or scanned and emailed to you upon request with a fee of \$1.00 per copy for each month requested.” It should be noted that the Village believed it had attached the minutes to an earlier email free of charge to the Applicant and was only requesting a fee in the March 26, 2021 email as it thought it was being asked to send a second copy. Therefore, the Village was compliant with its obligations under section 7(2)(b) of LA FOIP.

### ***Outstanding Item***

[30] In item #7, the Applicant requested, “policy, procedure, bylaws related to receiving and actioning community complaints of safety concerns or illegal activity.” On March 1, 2021, the Village responded to the Applicant advising, “being a small community, most people will either contact the office, a council member or the RCMP if a situation arises that is a safety concern or illegal activity.” As the Applicant was not provided records or advised the records did not exist, on March 3, 2021, my office asked the Village, “do any records exist? Policy, procedure, bylaws as per request?”

[31] In its March 26, 2021 response, the Village advised the Applicant in relation to item #7:

...

As per Policy, procedure, bylaws related to receiving and actioning community complaints of safety concerns or illegal activity? In the Council Procedures Bylaw, part III,13 (13.5) All administrative reports, communication from the public, requests, or any other material intended for inclusion in a council agenda must be received by the administrator immediately preceding the council meeting. This matter was included on the December 17th, 2020 agenda and emails were attached to the December 17,2020 minutes. Also, emails were included on the January 25th, 2021 agenda and again emails were attached to the January minutes.

...

[32] For this portion of the request, the Village has not advised the Applicant if specific records exist related to this item number. Therefore, the Village must address if there are records related to item #7. I find the Village's section 7 of LA FOIP response was not compliant for item #7 as it did not address if there were records responsive to this portion of the request. I recommend that within 30 days of issuance of this Report that the Village address item #7 of the Applicant's request indicating if there are records responsive to this portion of the request, and if so, provide to the Applicant subject to exemptions.

[33] The Village's section 7 response of March 26, 2021 advised the Applicant of their right to request a review by my office as is required by section 7(3) of LA FOIP. Therefore, the Village's section 7 response was compliant with section 7(3) of LA FOIP.

### **3. Did the Village conduct a reasonable search for records?**

[34] Section 5 of LA FOIP clearly outlines that access to records must be granted if they are in the possession or under the control of a local authority unless an exemption applies. Section 5 of LA FOIP provides:

**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.

[35] The *Guide to LA FOIP*, Ch. 3 discusses how searches for records should be conducted by a local authority starting at page 7.

[36] A “reasonable search” is one in which an employee, experienced in the subject matter, expends a reasonable effort to locate records which are reasonably related to the request. 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 (*Guide to LA FOIP*, Ch. 3, p. 7).

[37] When a local authority receives a notification letter or email from my office requesting details of its search efforts, some or all of the following can be included in the submission to my office (*Guide to LA FOIP*, Ch. 3, p. 9):

- 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 were included in the search.
- For general requests – tie the subject matter of the request to the departments/divisions/branches included in the search. In other words, explain why certain areas were searched and not others.
- Identify the employee(s) involved in the search and explain how the employee(s) is experienced in the subject matter.
- Explain how the records management system is organized (both paper & electronic) in the departments/divisions/branches included in the search.
- Describe how records are classified within the records management system. For example, are the records classified by alphabet, year, function 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.

(*Guide to LA FOIP*, Ch. 3, pp. 9-10):

[38] In its July 15, 2021 submission to my office, the Village advised that it took the following steps in regard to its search for records:

I would like to start by letting you know that I am the only employee for the village office. I myself have looked up any and all information requested. This is a small office and all of the documents are on paper in a Bylaw registry book and in a minutes book. We also have old files in a file cabinet in the office that I looked through to find information pertaining to [Applicant]’s questions. The office is also only open one day per week.

I have spent many hours reading through minutes, the Bylaw registry and old files trying to find answers to what [Applicant] had asked for.

...

In my search, the documents I found, I scanned and email [sic] to [Applicant]. These included Administrative Bylaw and Policy and Procedure Bylaws and a map of the village lots.

There was only a start up video relating to the cameras so I spoke with a security camera agency and passed on to [Applicant] in my email, the details they explained to me pertaining to our type of cameras over the phone.

There were a number of requests [Applicant] made for documentation that does not exist. Such as recreational vehicle Bylaw, noise Bylaw, phone records, call logs, and text messages.

[Applicant] request # 5 asks of policies, procedures, Bylaws or agreements related to the use of village property specifically the avenues beside [Applicant] to the East and land across the street. I found no documentation regarding this. I explained that the land across from [Applicant] is not village property and belonged to a farmer. I found that

no documents or complaints existed to show that the land to the east of [Applicant] that is only an access avenue to get behind resident property and to the field does not exist in any Bylaws or minutes I read through.

[39] The Village is a small office with one employee. Given this, it is reasonable that the employee would know where to search for records responsive to the access to information request. From the Village's submission, it appears that the Village administrator was overwhelmed with the access to information process and really got caught up in trying to answer the Applicant's questions. The Village's submission supports this notion, "... I am a new administrator and was not aware of the guideline set out by LA FOIP...."

[40] As noted above, the Village states, "...I have spent many hours reading through minutes, the Bylaw registry and old files trying to find answers to what [Applicant] had asked for." In addition, in its submission the Village addresses where they searched for the records that the Applicant requested. Based on its submission and the background on this file, I am satisfied that the Village conducted a reasonable search for records. I would also like to commend the Village Administrator in the steps they took to search for the many items included in the Applicant's request.

[41] I find the Village conducted a reasonable search for records responsive to the request.

[42] Although I have found that the Village conducted a reasonable search for records, I believe that the Administrator needs to build their knowledge of LA FOIP. I will discuss this at the end of this Report.

#### **4. Did the Village meet its duty to assist pursuant to section 5.1 of LA FOIP?**

[43] Section 5.1(1) of LA FOIP outlines a local authority's duty to assist when responding to an access to information request:

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

[44] Section 5.1(1) of LA FOIP requires a local authority to respond to an applicant's written access to information request openly, accurately and completely (*Guide to LA FOIP*, Ch. 3, p. 15).

[45] How a local authority fulfills its duty to assist will vary according to the circumstances of each request, and requires the exercise of judgment. The most important aspects of the duty to assist are likely to arise in the course of:

- Providing the information necessary for an applicant to exercise his or her rights under LA FOIP.
- Clarifying the request, if necessary.
- Performing an adequate search for records.
- Responding to the applicant.

(*Guide to LA FOIP*, Ch. 3, p. 17)

[46] From a review of the background for this file, there was an incredible amount of back and forth correspondence between the Applicant, the Village and my office. In this case, the Village Administrator expended a lot of effort in explaining policies, procedures and practices related to the items in the Applicant's request.

[47] The Village did appear to have good intentions in the way it handled the access to information request. At times, it seemed that the Village Administrator became overwhelmed in responding to the request. However, the Village Administrator was cooperative and responded to questions they were asked in a very timely manner and to the best of their ability.

[48] Therefore, I find the Village met its duty to assist when processing the access to information request.

[49] I do think it would be beneficial for the Village to ensure that the Administrator and perhaps the Mayor and Council have received training on their obligations under LA FOIP. The Access and Privacy Branch, Ministry of Justice (APB) can provide support to local authorities in meeting their obligations under LA FOIP. The APB has developed a free,

[Access to Information and Privacy Protection Online Training](#), which provides employees with training specifically for LA FOIP. The APB, if requested, could assist the Village in using this course for training and may be able to assist the Village in other LA FOIP training and awareness opportunities. I recommend the Village Administrator, Mayor and Council acquire access and privacy training for LA FOIP.

[50] In addition, in order to meet its statutory obligations when responding to access to information requests under LA FOIP, I recommend the Village Mayor and Administrator develop a policy and procedure that addresses how it will process and respond to requests in order to be compliant with its access to information obligations under LA FOIP.

[51] I would also like the Village to be aware that my office can assist with questions it may have in regard to LA FOIP. Should the Village have questions, it can contact my office at 306-787-8350.

#### **IV FINDINGS**

[52] I find the Village did not meet the 30-day timeline pursuant to section 7(2) of LA FOIP.

[53] I find the Village's section 7 of LA FOIP response was not compliant for item #7 as it did not address if there were records responsive to this portion of the request.

[54] I find the Village conducted a reasonable search for records responsive to the request.

[55] I find the Village met its duty to assist when processing the access to information request.

#### **V RECOMMENDATIONS**

[56] I recommend that within 30 days of issuance of this Report that the Village address item #7 of the Applicant's request indicating if there are records responsive to this portion of the request, and if so, provide to the Applicant subject to exemptions.



[57] I recommend the Village Administrator, Mayor and Council acquire access and privacy training for LA FOIP.

[58] I recommend the Village Mayor and Administrator develop a policy and procedure that addresses how it will process and respond to requests in order to be compliant with its access to information obligations under LA FOIP.

Dated at Regina, in the Province of Saskatchewan, this 15<sup>th</sup> day of July, 2022.

Ronald J. Kruzeniski, Q.C.  
Saskatchewan Information and Privacy  
Commissioner