



Office of the
Saskatchewan Information
and Privacy Commissioner

REVIEW REPORT 108-2025

City of Lloydminster

April 17, 2026

Summary:

The Applicant submitted an access to information request under *The Local Authority Freedom of Information and Protection of Privacy Act (LA FOIP)* to the City of Lloydminster (City). The City issued a \$1,950 fee estimate for the Applicant's access request. The Applicant paid the fee and the City released responsive records, withholding portions as non-responsive, or pursuant to sections 21(a) (solicitor-client privilege), 21(b) (prepared by or for legal counsel for the local authority in relation to the provision of advice or other services by legal counsel), 21(c) (correspondence between legal counsel for the local authority and any other person involving the provision of advice or other services by legal counsel) and 28(1) (third party personal information) of *LA FOIP*.

The Office of the Saskatchewan Information and Privacy Commissioner (OIPC) was asked:

- (1) To review the exemptions as applied by the City to the documents released pursuant to sections 21(a), (b), (c) and 28(1) of *LA FOIP*;
- (2) To review the search efforts of the City;
- (3) To review the fee as quoted by the City.

The Commissioner found:

- (1) *Application of Exemptions:*
 - a) The City properly applied section 21(a) of *LA FOIP* to the record;
 - b) The City properly applied section 28(1) of *LA FOIP* to some portions of the record, but not others;

- c) The City properly identified parts of the record as non-responsive.
- (2) *Search*: The City failed to demonstrate that the search was reasonable;
- (3) *Fee*: The City's fee of \$1,950 for processing the request was not reasonable;

The Commissioner recommended that:

(1) *Application of Exemptions*:

- a) The City continue to withhold the parts of the record where section 21(a) of LA FOIP was properly applied;
 - b) The City continue to withhold parts of the record where section 28(1) of LA FOIP was properly applied;
 - c) The City continue to withhold parts of the record as non-responsive.
 - d) Within 30 days of the issuance of this Report, the City release the portions of the record that involved the Applicant's own personal information or information outside the scope of section 23(1) of *LA FOIP*;
- (2) *Search*: Within 30 days of the issuance of this Report, the City conduct a new search for certain items as identified by the Applicant and issue a new section 7 response to the Applicant;
 - (3) *Fee*: Within 30 days of the issuance of this Report, the City refund the amount of \$1,289.70;

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I BACKGROUND

[1] On March 12, 2025, the City of Lloydminster (City) received an access to information request for the following records from the Applicant. The time period was specified as “From the beginning of my Employment within the City of Lloydminster Summer of 2016, up until now. Including anything regarding myself that’s been spoken about after my resignation.”

1. Personal Employee Records
 - Employment Contract
 - Job Descriptions: All including from when I began my employment.
 - Performance Evaluations: All including when I began my employment.
 - Disciplinary Records
 - Promotion and Pay Records
 - Training Records: specifically regarding my wish to get my IM training, as well as my grievance through the Union regarding this. Any other requests I made for IM training, also why it stopped being offered and the documentation stating reasons.
2. Communication Records
 - Emails and Correspondence: Anything pertaining to myself: emails, memos, TEAMs Communication, text messages via Cell Phones or other any other communications between myself and Management, HR, and colleagues that mention you or your mental health or any other disciplinary actions.
 - Meeting Notes: Notes from meetings where your performance, behavior, or mental health was discussed.
 - HR Complaints: Any complaints I filed or that were filed against me, including the outcomes.
3. Accommodation Requests: Documentation of any requests I made for accommodations related to your mental health (e.g., flexible hours, leave, or modified duties).
 - Responses to Accommodation Requests: How the organization responded to your requests, including any denials or approvals. –
 - Medical Documentation: Any medical notes or letters I provided to support your accommodation requests.
4. Leave Records
 - Sick Leave Records: Documentation of any sick leave I took, including the reasons provided. A detailed list of my attendance from when I began working until my resignation was put in.
 - Medical Leave Records: Records related to any medical leave I took, including any communication with HR and management.

- Return-to-Work Plans: Any plans or agreements made when I returned to work after a mental health-related absence.
5. Discrimination and Harassment Records
- Complaints Filed: Any complaints I filed regarding discrimination, harassment, unfair treatment, my mental health struggles, requests for accommodation – not limited to HR but from my Supervisors as well ([Name of Individual 1] and [Name of Individual 2])¹
 - Investigation Reports: Reports from any investigations into my complaints, including findings and actions taken.
 - Witness Statements: Statements from colleagues or witnesses regarding myself.
6. Policy and Procedure Documents
- Workplace Policies: Copies of workplace policies related to mental health, discrimination, harassment, and accommodation.
 - HR Procedures: Documentation of the procedures followed by HR in handling mental health issues, accommodations, complaints, harassment and discrimination. As well as Duty to Inquire, Duty to Accommodate policies for Mental Health and Child Care as well. Also documentation on the stipulations of a policy change, what is the specific process?
7. Comparable Employee Records
- Peer Records: I'm requesting anonymized records of how similar situations were handled for other employees (e.g., accommodations, promotions, harassment, discrimination and any disciplinary actions).
8. Union or Collective Agreement Records
- Union Correspondence: Any communication between myself and my union and my employer regarding my mental health or treatment at work.
 - Grievance Records: Records of any grievances filed on my behalf or related to my situation, including my IM training grievance. I would also like to know when the policy changed to take away IM training as being an option. Any supporting documents regarding policy and procedures for Education and Advancement within the company. Reasons why LOCC employees at the Front Counter, as well as various other ME positions within the City in the RCMP, given this opportunity but not the dispatchers.
9. Exit Interviews
- Exit Interview Notes

¹ The use of square brackets in this Report are amendments by OIPC to preserve the identity of the Applicant and third party individuals.

- I would like to obtain my Exit interview notes as well as any follow up regarding my Exit interview.

10. Other Relevant Documents

- Incident Reports: Any reports of incidents involving me, or where I am spoken about - whether it be verbally or written, the outcome and documentation from the Supervisors, Human Resources or anyone else that was involved regarding my discipline as well.
- Surveillance or Monitoring Records

My Supervisor monitored me on a Alberta Government 9-1-1 program, I would like details as to why that was done as well as times, dates, specifics on what she saw about me. I would like to know if there any surveillance via camera obtained about me.

What is the Policy for accessing Alberta Government 9-1-1 programs for Employee information? Is this considered a breach at all with being that it is private information for the callers.

I would like times and dates on all the documentation requested above as well.

[2] On March 13, 2025, the City, emailed the Applicant and confirmed receipt of the access request. They continued:

Based on the information outlined above, we can certainly proceed with the request as is, upon receipt of the \$20 initial fee, however I would advise that as per the legislation we are required to assess all records and provide a cost estimate for processing under the LAFOIP legislation which may be substantial.

In the interest of assisting and saving you money, I would like to offer the opportunity for you to request this information directly from Employee Relations as they would be able to provide anything that is associated with your personnel file outside of the LAFOIP process.

With regard to the policies, please note that all policies are available to the public on the City of Lloydminster website.

Following receipt of your file, you would still be eligible to submit a LAFOIP request, however I suspect at that point for much less information (and cost). It is also important that you understand that some of the information that you have requested would not be subject to disclosure under a LAFOIP request.

[Emphasis in original]

[3] On March 13, 2025, the Applicant paid the \$20 application fee.

[4] On March 15, 2025, the City issued a \$1,950.00 fee estimate to the Applicant and requested a deposit of \$975.00 to proceed. The City also advised the Applicant that it did not calculate a fee for records that had been previously released to the Applicant by means of the Employee Relations department:

...
We would confirm that no fees have been calculated for the following information, as it has already been provided to you by Employee Relations on March 13, 2025:

- “1. Personal Employee Records
 - Employment Contract
 - Job Descriptions: All including from when I began my employment.
 - Performance Evaluations: All including when I began my employment.
 - Disciplinary Records
 - Promotion and Pay Records
 - Training Records: specifically regarding my wish to get my IM training, as well as my grievance through the Union regarding this. Any other requests I made for IM training, also why it stopped being offered and the documentation stating reasons.”

If you still wish to obtain the information provided by Employee Relations in duplicate through *The Local Authority Freedom of Information and Protection of Privacy Act* request, additional charges will apply.

[5] On March 18, 2025, the Applicant paid the \$975.00 deposit to proceed with the processing of the access request.

[6] On April 11, 2025, the City responded to the Applicant and noted that “the remainder of your request has been granted, and the information will be released upon payment of the outstanding amount of \$975, as outlined on the attached ‘Estimate of Costs’.” On April 14, 2025, the Applicant paid the remaining \$975.00 fee.

- [7] On April 14, 2025, the City released the responsive records to the Applicant, indicating that redactions were effected pursuant to sections 21 and 28 of *The Local Authority Freedom of Information and Protection of Privacy Act (LA FOIP)*.²
- [8] On April 15, 2025, the Applicant emailed the City seeking clarification: "...for the larger documents that were redacted completely? From my understanding I am entitled to this... I'm looking for an explanation as to why the redactions not just a Sectional quote, it seems it's something I should be entitled to." On April 16, 2025, the City provided snippets of the relevant portions of the legislation and clarified that "all redacted sections without specific notation are redacted under section 28(1). No additional explanation is available."
- [9] On May 12, 2025, the Applicant requested a review with the Office of the Saskatchewan Information and Privacy Commissioner (OIPC). On December 3, 2025, the Applicant confirmed the scope of the review request to include the City's search efforts to identify responsive records, the reasonableness of the \$1,950 fee and the propriety of the applied exemptions.
- [10] On December 3, 2025, OIPC notified both the City and the Applicant that it would be undertaking a review with respect to: (1) the decision of the City to deny access to part of the record pursuant to sections 21(a), (b), (c) and 28(1) of *LA FOIP*; (2) the fee charged to process the Applicant's request in the amount of \$1,950; and (3) the search efforts of the City as the Applicant did not believe all records responsive to their request were located.
- [11] This office requested the City provide a copy of the records and index of records by January 2, 2026, and invited both parties to provide submissions by February 2, 2026. The City provided the requested materials and both parties provided submissions on this matter. The City *did not* consent to sharing its index of records or submission with the Applicant.

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

II RECORDS AT ISSUE

[12] The City submitted that it had prepared an 869-page record for the Applicant. Of the 869 pages, the City released 448 pages in full to the Applicant. The City’s preparation of the record left much to be desired. It may have appeared to the Applicant that the City withheld 412 pages in part, and 9 pages in full. However, as will be explained below, the number of pages the City withheld *in full* is more accurately 41 pages (in addition to email attachments that will be described below).

[13] No review can occur without a determination of the exact number of pages in a record and this record was submitted to us with many issues that we had to untangle.

[14] For example, the City withheld five pages, pages 269, 636, 656, 659 and 703 in full as non-responsive. The City explained that these pages represented documents that contained the information of other employees and any information pertaining to the Applicant had been released, in part, on other pages of the record. The City identified that page 636 of the record is really a three-page spreadsheet. This brings the count of non-responsive records withheld in full to seven pages, as opposed to five with respect to this tranche of records.

[15] In the record released to the Applicant, the City mistakenly submitted that it withheld only 3 pages in full (pages 181, 191 and 435), pursuant to the exemptions in section 21(a), (b) and (c) of *LA FOIP* and one page (page 227) in full pursuant to the exemption in section 28(1) of *LA FOIP*. Our careful review revealed that the City actually withheld 34 pages of records in full, instead of four. The overall number of pages withheld in full may be summarized as follows:

Page Numbers on Applicant’s Copy of the Record Plus Description of Actual Pages Involved	Exemption Applied by the City
Page 181 – 5-page email thread and four attachments (attachments are comprised of two screenshots, a two-page email thread, and a spreadsheet with 2 columns and 32 rows of data)	Section 21(a), (b) and (c) of <i>LA FOIP</i>

Page 191 – 6-page email thread	
Page 435 – 16 pages (three email threads) – one email thread includes four attachments (attachments are comprised of two screenshots, a two-page email thread, and a spreadsheet with 2 columns and 32 rows of data)	
Page 227 – 7 pages of records comprised of an incident report and notes	Section 28(1) of <i>LA FOIP</i>
Total: 34 pages withheld in full	

[16] We now know that 34 pages of records were redacted in full pursuant to sections 21(a),(b), (c) and 28(1) of *LA FOIP*. When you consider that there were 7 pages of non-responsive records, the total number of pages withheld in full from the Applicant totals 41. This would mean that the record that was prepared by the City was in actuality 901³ pages plus email attachments within the solicitor/client privilege tranche (described in the table above). The City never prepared these email attachments into pdf documents so we will not speculate on the true number of pages in this record.

[17] Having reconciled the number of pages as best we could, we note that the number of pages that will be under review are further reduced because of even more inconsistencies in the preparation of the record.

[18] To begin with there were embedded documents in some pages that were accessible if one selected the attachment names in the email headers: see pages 187, 192, 198, 199, 215, 218, 226, 229, 246, 247, 248, 251, 313, 317, 320, 324, 328, 332, 336, 340, 344, 410, 412, 414, 416, 436, 457, 470, 476, 488, 492, 494, 503, 511, 512, 516, 517, 519 and 554. The responsive record prepared by the City included some of these pages in redacted form. However, OIPC confirmed that the Applicant could access the embedded documents by selecting the attachment names in the email headers. This included unredacted and duplicate copies of some pages already received in redacted form. As a result, there is no

³ 869 pages (original count) – 9 (original count of pages withheld in full) + 41 (actual number of pages withheld in full) = 901 page record.

utility in in this office reviewing the following 51 pages of the record where the City applied its redactions but also provided full access elsewhere in the record:

Page of Applicant’s Record that was Partially Redacted and Won’t be Under Review	Cross-reference to a Page in Record Where There is an Accessible Link to a Non-redacted Version
Page 807	Page 187, Attachment 2
Pages 230 to 231 Pages 816 to 817 Pages 834 to 835 Pages 841 to 842	Page 192 Page 229 Page 246
Page 833 Page 840	Page 198 Page 199 Page 251
Pages 572 and 574 to 577	Page 218, Attachment 1 Page 476 *The meeting notes in the embedded attachment includes the same content as found on pages 572 to 577 of the responsive record, as well as additional details not included in the responsive record.
Page 709 Page 790	Page 218, Attachment 2
Page 779	Page 226, Attachment 1
Page 838	Page 247
Pages 593 to 597	Page 492, Attachment 2
Pages 598, 601 to 609, 611 to 614, 616 to 618, 621 to 624, 626, 628, 629, 631 and 632	Page 554

[19] Further, the City did not apply section 28(1) of *LA FOIP* consistently in its withholding of the contact information of individuals. Accordingly, this office will not review the application of section 28(1) of *LA FOIP* to the contact information withheld on the following 37 pages of the record, as the Applicant is already in receipt as explained below:

Page of Applicant’s Record that was Partially Redacted and Won’t be Under Review	Cross-reference to a Page on Record Where the Contact Information is Released/Accessible
<p>Pages 197, 228, 232, 248, 250, 252, 270, 420 to 425, 427 to 429, 432, 434, 449, 455 to 462, 464 to 468, 472, 474, 534, 704 and 745</p> <p>(Total of 37 pages)</p>	<p>The City released the cellphone number for the City Safety Officer on pages 196, 215, 446, 450, 453, 454 and 470 of the record.</p> <p>On page 423, the City released the phone number for WCB Adjudicator 1 and the email address for this Adjudicator is accessible from the hyperlink in the email header on this page.</p> <p>The City also released the email address and phone number for WCB Adjudicator 2. On pages 218 and 232 of the record released the email address of WCB Adjudicator 2 and is accessible from the hyperlink in the email header on pages 454, 457, 460, 464, 467. The phone number for this Adjudicator was released on page 704 and is accessible in attachment 2 of page 218.</p>

[20] Of the 37 pages of records listed in the table above, eight pages (pages 422, 425, 429, 455, 458, 462, 465 and 468) have other information redacted pursuant to section 28(1) of *LA FOIP*. The application of this mandatory exemption will be reviewed later in this Review Report.

[21] In summary, the total number of pages at issue in this review involve 332 pages of records withheld in part (not 412) and 41 pages that were withheld in full.

Calculation of the Total Number of Pages at issue in this Review Report	Number of Pages in Record
Actual number of pages of the record	901 pages
Minus pages the City released in full to the Applicant	448 pages
Minus pages of the record not at issue – unredacted records available in embedded files	51 pages
Minus pages of the record not at issue – contact information available elsewhere in Report (37 pages – 8 pages that contain other redacted information still at issue)	29 pages
Total Number of Pages at issue in this Review	373 pages
Number of Pages withheld in Full	41 pages
Number of Pages withheld in Part	332 pages

III DISCUSSION OF THE ISSUES

1. Jurisdiction

[22] The City is a “local authority” pursuant to section 2(1)(f)(i) of *LA FOIP*. OIPC has jurisdiction to undertake this review pursuant to PART VI of *LA FOIP*.

2. The Application of Exemptions

a. The Application of Section 21(a) of *LA FOIP* to the Responsive Records

[23] Section 21(a) of *LA FOIP* provides as follows:

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

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

[24] The City fully withheld 27 pages of records in the application of this exemption, as well as email attachments consisting of images, emails and Excel spreadsheets, as described in the table below:

Page Number Identified on Record	Description of Page Grouping
181	<p><i>5-page email thread</i> and four attachments – emails between the City and legal counsel.</p> <p>The four attachments (two screenshots, an email thread and a spreadsheet consisting of two columns and 32 rows of data) providing background information relevant to the legal advice requested by the City.</p>
191	<p><i>6-page email thread</i> – one email between City employees related to the legal advice provided in the email thread. The remaining emails between the City and legal counsel.</p>
435	<p><i>16 pages</i> consisting of 3 emails threads and four attachments described below:</p> <ul style="list-style-type: none"> • two emails between City employees regarding legal advice to be requested. The remaining emails between the City and legal counsel. • One email thread and four attachments – one email between City employees regarding legal advice to be requested. The remaining emails between the City and legal counsel. <ul style="list-style-type: none"> • The four attachments (two screenshots, an email thread and a spreadsheet consisting of two columns and 32 rows of data) providing background information relevant to the legal advice requested by the City. • emails between the City and legal counsel.
	<p>Total: <i>27 pages</i> (with unknown number of pages of attachments not provided in PDF format)</p>

[25] The exemption that allows a document to be withheld pursuant to solicitor-client privilege under section 21(a) of *LA FOIP* applies to records that involve communications between a

solicitor and a client. These communications must involve the seeking or giving of legal advice and these communications are intended by the parties to be strictly confidential.

[26] Attachments can fall within the continuum of legal advice as “background information” relevant to the advice requested from the solicitor by the client. Some documents may not actually be a communication between solicitor and client but nonetheless fall within the continuum of legal advice. For example, discussions between public officials where they share the legal advice given, notes containing the legal advice, or a solicitor’s briefing notes and work.⁴

[27] The email threads clearly involve written communications between a lawyer who is listed as practicing with the Law Society of Alberta in full standing. The email threads include communications between the City and the lawyer, and communications between City employees regarding the legal advice provided, or the City’s request for legal advice. Our review agrees that these communications relate to the giving and seeking of legal advice.

[28] One email thread includes attachments forwarded by the City to the lawyer for the purpose of factual “background information” upon which legal advice could be based. This communication falls within the continuum of legal advice.

[29] There is no doubt that the email threads, with the associated attachments, were provided within the sphere of solicitor client privilege and intended to be kept confidential.⁵

[30] The City has properly applied section 21(a) of *LA FOIP* to the records identified at paragraph [24] of this Report. As it has been found that section 21(a) of *LA FOIP* applies, there is no need to consider the application of section 21(b) or (c) of *LA FOIP*.

⁴ OIPC [Review Report 282-2024](#) at paragraphs [96] and [97].

⁵ [Blank v Canada \(Minister of Justice\)](#), [2006] 2 SCR 319 at paragraph [32].

b. The Application of Section 28(1) of LA FOIP to the Responsive Records

[31] The City withheld 330 pages of records in part and seven pages of records in full pursuant to section 28(1) of LA FOIP. The 330 pages of the record that were withheld in part under section 28(1) of LA FOIP include the following:

Page of Responsive Record	Description of Record	Type of Information withheld
2, 3, 4, 6, 7, 8, 9, 10, 11, 12, 14, 16, 19, 20, 21, 22, 26, 27, 28, 29, 30, 31, 32, 34, 36, 39, 40, 41, 42, 43, 44, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 59, 60, 61, 64, 65, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 94, 95, 96, 100, 101, 103, 104, 105, 106, 107, 108, 109, 111, 112, 113, 116, 122, 123, 124, 125, 126, 128, 129, 132, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 753, 754, 755	Email of screen shots of messages (includes text messages/Imessages where the Applicant is the recipient and group messages in which the Applicant is one of the senders/recipients)	Name of individuals, details of an individual’s health care, photos of individuals
145, 149, 155, 158, 159, 160, 162, 164	Screenshot of messages (text messages/Imessages where the Applicant is the recipient)	Names of individuals
146, 148, 150, 152, 154, 156, 690 to 696, 850 to 852	Screenshot of messages (text messages/Imessages between other individuals – the Applicant does not appear to be a recipient/sender)	Names of individuals, name of organization (in relation to an employee’s email account)
165 to 176	Group message thread (group messages in which the Applicant is one of the senders/recipients)	Names of individuals, contact information of individuals
177 to 178, 268, 635, 655, 657, 658	Spreadsheet recording employee details (including vaccination status, training and certifications) – rows of data related to Applicant	Names of individuals and details pertaining to those individuals

	released, withheld all other rows	
196, 198, 199, 222 to 224, 249, 251, 422, 425, 429, 436 to 443, 446 to 448, 450 to 452, 455, 458, 462, 465, 468, 476 to 478, 480 to 483, 485, 493, 499, 506, 516, 523, 524, 526 to 529, 531, 535 to 537, 539, 543, 544, 551, 554, 555, 578 to 580, 582 to 585, 587, 698 to 701	Email communications	Names of individuals, cellphone number
254, 256 to 258, 780, 825, 844 to 847	Employee forms, checklists, acknowledgements	Names of individuals, signatures
305, 306, 746 to 751, 849	Handwritten notes	Names of individuals, details related to a matter involving another employee, signature
561, 563, 565, 567	Letters	Signatures
638 to 641, 643, 646 to 654	Email of screenshots of Teams messages (the Applicant does not appear to be one of the senders/recipients)	Names of individuals, messages relating to employment status and reasons for change in status of other employees, phone number, name of a third party organization
660 to 689	Email of screenshots of WhatsApp group chat messages (the Applicant is one of the senders/recipients)	Names of individuals, phone numbers, photos of individuals, address of fire hall
702	Staff announcements – New hires and staff departures (dated June 30, 2016)	Name of individuals, position/department, photo of individual
752, 756 to 777	Email of messages (text messages/Imessages between other individuals – the Applicant is not a sender or recipient)	Name of individuals, a location, phone number

853 to 869	Screenshots of group chat messages (the Applicant is one of the senders/recipients in this group message thread	Names of individuals, phone numbers
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[32] Section 28(1) of *LA FOIP* provides:

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.

[33] As previously noted, section 28(1) of *LA FOIP* is a mandatory exemption. Prior to a consideration of section 28(1) of *LA FOIP*, the first determination must be whether the information qualifies as “personal information” as defined by section 23(1) of *LA FOIP*. For information to be “personal information”, it must 1) be about an identifiable individual; and 2) be personal in nature.

[34] The City failed to explain how the information it withheld in this section of the review qualified as personal information. However, based on our review, the following sections of *LA FOIP* are relevant in this case:

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:

(a) information that relates to the race, creed, religion, colour, sex, sexual orientation, family status or marital status, disability, age, nationality, ancestry or place of origin of the individual;

(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;

(c) information that relates to health care that has been received by the individual or to the health history of the individual;

...

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

...

(k) the name of the individual where:

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

(ii) the disclosure of the name itself would reveal personal information about the individual.

[35] As outlined, the information at issue includes names,⁶ contact information,⁷ photos of individuals,⁸ and other details that could reveal personal information about identifiable individuals.⁹ Most of the information identified by the City and as listed in paragraph [31] of this Report, qualifies as personal information pursuant to sections 23(1)(a), (b), (c), (e) and (k) of *LA FOIP*. This information should continue to be withheld pursuant to section 28(1) of *LA FOIP*, *except for* the information described as paragraphs [36] and [37] of this Report that follow.

⁶ OIPC [Review Report 154-2025](#) at paragraphs [32] to [35] provides that the name of an individual acting in their professional capacity qualifies as personal information pursuant to section 23(1)(k)(i) of *LA FOIP*.

⁷ [OIPC Review Report 163-2025](#) at paragraph [30] provides that personal and professional contact information of individuals qualifies as personal information pursuant to sections 23(1)(e) and (k)(i) of *LA FOIP*. *Schiller v Government of Saskatchewan (Ministry of Education)*, 2025 SKKB 146 provides that the personal and professional information of individuals employed by public or government institutions qualifies as personal information and should not be disclosed unless the information is publicly available or consent has been granted for the dissemination

⁸ OIPC [Investigation Report 035-2024, 047-2024, 052-2024, 059-2024](#) at paragraphs [15] and [16] provide that images of individuals qualify as personal information.

⁹ OIPC [Investigation Report 005-2022, 006-2022](#) at paragraph [16] provides that an information relating to an individual's vaccination and COVID-19 status qualified as "personal health information"; OIPC [Investigation Report 078-2025](#) at paragraph [51] provides that an information pertaining to an individual's specialty training qualifies as "education history".

- [36] The following pages contain the Applicant's own personal information (or information closely connected to the Applicant) and should be released:¹⁰ pages 11, 21 to 23, 25 to 28, 30, 34, 36, 39, 40, 42, 43, 48, 49, 55, 56, 59, 60, 65, 67, 68, 71, 73, 75, 78, 84, 86, 88, 95, 100, 106, 111 to 113, 122, 146, 254, 256 to 258, 455, 458, 462, 465, 468, 674, 758, 759, 780 and 825.
- [37] The name of a third-party organization and the address of a fire hall, redacted on pages 654 and 671, respectively, do not relate to an identifiable individual or reveal information that is personal in nature. Further, the address of the fire hall is publicly available.¹¹ The name of the third-party organization (page 654) and the address of the fire hall (page 671) should be released to the Applicant.
- [38] The City withheld page 227 of the record in full pursuant to section 28(1) of *LA FOIP*. When we consulted the city about page 227 we learned that the City was referring to seven pages in total: a five-page report and two pages of notes. The five-page report relates to a matter involving another employee altogether that qualifies as personal information of another individual pursuant to sections 23(1)(b), (c) and (k) of *LA FOIP* and should continue to be withheld. The two-pages of notes pertain to a matter involving the Applicant. These notes contain the Applicant's own personal information so the City should release these two pages while, continuing to withhold the personal information of other individuals on these two pages pursuant to section 28(1) of *LA FOIP*.

¹⁰ Section 30 of *LA FOIP* provides the right of access to an individual's own personal information. Information closely connected to the Applicant that should be released in this instance includes: the names of individuals related to the Applicant, the Applicant's own name as it appears in the record and the name of the Applicant's medical provider.

¹¹ Section 28(2)(p) of *LA FOIP* provides that personal information may be disclosed if the information is publicly available; Paragraph [27] of OIPC [Review Report 163-2025](#) provides that information is publicly available if it is available or accessible to the citizenry at large; see also [Schiller v Government of Saskatchewan \(Ministry of Education\)](#), 2025 SKKB 146.

c. Non-Responsive Records

[39] The City withheld pages 269, 636, 656, 659 and 703 of the record in full as non-responsive (as described at paragraph [14], these pages account for seven pages of records). The City explained that these pages represented documents that contain the information of other employees and any information pertaining to the Applicant had been released, in part, on other pages of the record.. Our review proved that the City correctly identified these pages of the record as non responsive and they should continue to be withheld in full.

[40] The City also withheld portions of handwritten notes as non-responsive on pages 304 and 307. The City released parts of these records in part where the Applicant's own information was contained. However, it withheld other portions of these pages when the information pertained to other, unrelated, matters. Our review affirmed that the City has correctly identified the portions of these pages as not responsive and these portions should continue to be withheld.

3. Did the City conduct a reasonable search for records?

[41] The Applicant did not believe that all records were located responsive to the request, including certain specific items as specified by the Applicant below:

1. Surveillance logs (Alberta 9-1-1 monitoring): I specifically requested details of monitoring conducted by my supervisor using Alberta Government 9-1-1 programs, including times, dates, and reasons.
2. Policies justifying surveillance: I asked for policies authorizing the use of 9-1-1 systems for employee monitoring.
3. Full accommodation request responses: While some accommodation records were provided, I believe complete responses and related internal correspondence were omitted.
4. Anonymized peer records" (item 7 of my request).

[42] Section 5 of *LA FOIP* provides an applicant with a right of access to records in the possession of a local authority. Section 5 of *LA FOIP* states:

Right of access

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.

[43] OIPC has historically established two circumstances where a local authority can validly claim the non-existence of a record under *LA FOIP*.¹² The first is if a records exists but is in the possession/control of a party other than the local authority. The second circumstance is relevant to this case: if a reasonable search failed to produce records. To validate this claim, the City must provide convincing submissions that a reasonable search was conducted.

[44] A “reasonable search” is one where an experienced employee expends a reasonable effort to locate records that are reasonably related to the request. A “reasonable effort” is the level of effort one would expect of any fair, sensible person searching areas where records are likely to be stored. What is reasonable depends on the request, itself, and related circumstances.¹³

[45] OIPC has developed a list of search strategies that a local authority may use to substantiate a reasonable search for records:¹⁴

- For personal information requests – provide an explanation as to how the subject of the personal information is involved with the local authority (i.e., client, employee, former employee, etc.) which should explain 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) tasked with the search and explain how the employee(s) is experienced in the subject matter and would have the requisite knowledge to carry out the search.

¹² OIPC [Review Report 077-2025](#) at paragraph [15].

¹³ OIPC [Review Report 275-2024](#) at paragraph [13].

¹⁴ OIPC [Review Report 254-2025](#) at paragraph [18].

- 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. Explain which folders within the records management system were searched and how these folders link back to the subject matter. For electronic searches – indicate what key terms were used in the search.
- Provide a copy of the record schedule for the local authority and screen shots of the electronic directory (folders & subfolders).
- If the record has been destroyed, provide a copy of the record schedule and/or destruction certificate.
- Explain whether records stored off-site were searched and if not, explain why.
- Explain whether records in the control of the local authority/third party were searched and how. Third parties in this instance may include: a contractor or an information management service provider.
- Explain whether mobile electronic devices were searched and how (i.e., laptops, smart phones, cell phones, tablets).
- Indicate the calendar dates of each search.
- Indicate the length of the search.
- Indicate the results of each search if more than one search was conducted.
- Consider having the details of the search affirmed or sworn by an employee in an affidavit.

[46] The City identified six employees, identified as “subject-matter experts”, that conducted searches for the responsive record for a total of 25 hours. The City stated that the records were located by searching the Applicant’s name, and that the *LA FOIP Request Guidelines for Search* was shared with employees to conduct the search and provides:

What is a Record?

- A record is information in any form, including information that is written, photographed, recorded or stored in any manner, but does not include computer programs or other mechanisms that produce records including:

- Emails;
- Pictures;
- Agreements and contracts;
- Voicemails;
- Notes and sticky notes;
- Letters;
- Invoices;
- Recordings;
- Text messages.

Where to Search?

- Outlook emails and calendars;
- Teams chats/sites;
- SharePoint sites;
- all programs (GP, Pearl, Intelli, etc.);
- paper files;
- notebooks, handwritten notes and sticky notes,
- text messages (including personal phones that contain work related discussions);
- and remember to ask all of team members that may have records, to perform the same searches.

What to Search?

- Use key words contained in the request and confirm that any records that you recover fall within the timeline of the request.
 - Ex: if the request is for all records pertaining to a certain property, make sure that you are searching by property owner name(s), Lot/Block/Plan, just Plan, civic address, etc. in order to thoroughly cover all possibilities.

[47] The City chose not to provide our office with details regarding when the searches were conducted, what files, applications, devices, etc. were searched by each of the six employees, or how it determined which departments or employees should be searched for responsive records. This lack of detail rendered it difficult to confirm that the duration of the search was actually 25 hours. Logic dictates that the subject matter of this access request would have led to documents that had been saved to specific folders within the City's electronic records management system. Further, the City submitted it searched by means of one keyword - the Applicant's name. We surmise that to search any electronic folders, including Outlook, would have produced a large volume of records, the majority being non-responsive since the Applicant was a former employee.

[48] The City indicated that “no relevant records were identified” for items 1, 2 and 4 listed in paragraph [41] above, and that all relevant records were disclosed in relation to item 3. Once again, the City chose not to provide additional information with respect to the details of its search for these records.

[49] Applicants bare an onus to establish the basis of the belief that a record exists. The provision of supporting evidence greatly assists in this regard.¹⁵ In situations where an Applicant believes there are additional relevant and responsive records, the issue should first be addressed with the local authority in a spirit of mutual co-operation prior to a request for a review from OIPC.¹⁶

[50] With respect to Item 1 in paragraph [41], the Applicant stated in a March 3, 2026 email to this office:

“I have documentation confirming that my supervisor was monitoring me using Alberta 9-1-1 systems. I am seeking any and all logs, audits trails, access records, or system generated reports that show when my supervisor accessed or monitored my activities within these systems... This would include date, time, and duration stamps of access events linked to my *employee identifiers*.”

[51] The Applicant did not provide OIPC with copies of the documentation as referenced above. Still, since the City maintains that the only keyword used in its search was the Applicant’s name, we conclude that the City may not have captured all requested records because the Applicant has requested a record that is linked to the *employee identifiers*. The City did not provide helpful details on this issue and we conclude that the employee identifiers may be something other than the Applicant’s name. Therefore, it may very well be that all responsive records may not have been captured in this segment of the search.

[52] With respect to item 2 in paragraph [41], the Applicant sought internal policies relating to the 911 monitoring of employees. The City has indicated that no relevant records were

¹⁵ OIPC [Review Report 365-2021](#) at paragraph [24].

¹⁶ OIPC [Review Report 035-2026 \(Part I\)](#) at paragraph [24].

identified, however, again, if the only search term used by the City was the Applicant's name, it is not likely its search would have capture an internal policy document.

[53] With respect to item 3 in paragraph [41], the Applicant conceded that "some accommodation records were provided, I believe complete responses and related internal correspondence were omitted." In a March 3, 2026 email to this office the Applicant noted that it was looking to access "complete accommodation file, including all internal communications, decisions, and notes related to my accommodations in 2017, 2020 and 2024."

[54] The Applicant did not provide this office with any evidence to support their assertion that records are missing in relation to item 3 in paragraph [41]. As noted, the City has failed to identify what files were searched. However, it would be reasonable that such records related to the Applicant's own accommodations would be saved to a specific file or file drive and a search of the Applicant's own name within this area would indeed capture the records sought by the Applicant. The Applicant acknowledges that some of the records were provided, but they believed additional records exist. It is reasonable to conclude that the City conducted a search in the appropriate area to locate such records, and without evidence from the Applicant otherwise, we conclude the City has conducted a reasonable search for this item.

[55] With respect to item 4, the Applicant requested anonymized peer records related to accommodations, promotions, harassment, discrimination and any disciplinary actions, etc. In a March 3, 2026 email to this office, the Applicant indicated that "a key part of my original request was for anonymized peer records to allow for a fair comparison of treatment." The City has provided that "no relevant records were identified" but did not explain how it searched for these records. Based on the subject matter, responsive records should exist as it would be highly improbable that the Applicant is the only employee that has ever received accommodation or fair treatment in an employment situation. Once again, the only details the City provided our office with respect to the nature of the search was that the Applicant's name was the sole keyword. This clearly would not produce records responsive to this part of the Applicant's request.

[56] The Applicant requested anonymized peer employment records in item 4. We are careful to note that the type of information normally found in an employee’s personnel file such as accommodations, promotions, harassment, discrimination and any disciplinary actions all qualify as “employment history.”¹⁷ This may well qualify as personal information pursuant to section 23(1)(b) of *LA FOIP*. Even if records existed in relation to their request, it should be noted that it may not be possible for the City to release these records in a de-identified manner. That is because, given the Applicant’s past employment with the City, the release of these records with the names redacted may still allow for the identification of the individual and the revelation of personal information.¹⁸ Nonetheless, if responsive records exist, they must be identified in a proper search and the proper exemption applied.

[57] The City did not demonstrate that a reasonable search was conducted for records responsive to items 1, 2 and 4, as described at paragraph [41] of this Report.

4. The Reasonableness of the Fee charged by the City

[58] The City issued a fee estimate to the Applicant in the amount of \$1,950 engaging section 9(2) of *LA FOIP*. Section 9(2) of *LA FOIP* provides that an Applicant is not required to pay an amount greater than the estimated amount. In this case, the *final fee* charged by the City did not deviate from the estimated amount of \$1,950.

[59] *LA FOIP* provides for reasonable cost recovery. There are three general types of fees to consider in a fee estimate: (1) a fee for searching for records; (2) a fee for preparing the records for disclosure; (3) a fee for reproducing the records. A “reasonable fee estimate” is one that is proportionate to the work required by the local authority to respond effectively and efficiently to an access to information request. A fee estimate is “equitable” when it is

¹⁷ OIPC [Review Report 152-2023](#) at paragraph [62].

¹⁸ In OIPC [Investigation Report 114-2017](#) at paragraph [14], this office noted that the removal of an individual’s name, alone, does not necessarily sufficiently de-identify information; OIPC [Review Report 210-2023](#) at paragraph [20] defines “Indirect or quasi-identifiers” as fields of information that may be used on their own or in combination with other indirect or quasi-identifiers, or other information, to indirectly identify an individual.

fair and even-handed, meaning applicants should bear a reasonable cost of producing records. Applicants should not, however, bear costs arising from administrative inefficiencies.¹⁹

[60] The City provided the following fee estimate to the Applicant:

	Type of Fee	Calculation of Fee	Total Amount of Fee
1	Time required to locate and prepare records for disclosure (redacted source documents)	66 hours x \$15.00/half hour Number of records: 496 x 5 min of review per record = 41 hours + 25 hours search and locate for all records = 66 hours	\$1,980.00
2	Documents provide in electronic format only, photocopies at an additional charge	No charge	\$0.00
3	LESS:	1-hour free x \$15.00/half hour	\$30.00
Total Amount of Fee Required to Process Access Request			\$1,950.00

[61] The City did not estimate a fee for reproducing the records because they were conveyed in electronic format as opposed to paper. The *actual* fee charged to the Applicant was the same as the estimate provided to the Applicant. The analysis that follows will consider the reasonableness of the \$1,950 fee the City charged the Applicant for searching for records and preparing the records for disclosure.

a. Reasonableness of the Fee for Searching

[62] Section 5(3) of *The Local Authority Freedom of Information and Protection of Privacy Regulations (LA FOIP Regulations)*²⁰ describes the fee formula local authorities can apply when estimating a fee for searching or preparing responsive records. A local authority can

¹⁹ OIPC [Review Report 214-2025 \(Part II\)](#) at paragraph [26].

²⁰ [The Local Authority Freedom of Information and Protection of Privacy Regulations](#), R.S.S. c. L-27.1 Reg 1 (July 1, 1993), as amended.

charge \$15.00 for every 30 minutes of search or preparation time in excess of one hour. In other words, the first hour is free. Section 5(3) of *LA FOIP Regulations* provides as follows:

5(3) Where time in excess of one hour is spent in searching for a record requested by an applicant or in preparing it for disclosure, a fee of \$15 for each half-hour or portion of a half-hour of that excess time is payable at the time when access is given.

[63] Search time consists of every half hour manual search time required to locate and identify responsive records. Search time includes the physical search for records, the examination of file indices or paper/electronic records, the pulling of paper files, and the perusal of files to determine responsiveness. As a rule, search time does not include time spent copying records, going from office to office or to off-site storage, or in having someone review the results of a search.²¹

[64] OIPC has set out the following general standards for estimating search time:²²

- It should take an experienced employee one minute to visually scan 12 pages of paper or electronic records for responsiveness.
- It should take an experienced employee five minutes to search one regular file drawer for responsive file folders.
- It should take three minutes to search one active email account and transfer the results to a separate folder or drive. This standard also applies to searching other electronic devices such as cellphones.²³

[65] In instances where these tests do not accurately reflect the circumstances, the local authority should design a search strategy and test a representative sample of records for time. The time can then be applied to the responsive records as a whole.²⁴

²¹ *Supra*, footnote 19 at paragraph [29].

²² *Ibid*, at paragraph [30].

²³ OIPC [Review Report 256-2025](#) paragraph [27].

²⁴ OIPC [Review Report 119-2016](#) at paragraph [20].

[66] In its fee estimate, the City reported 25 hours to search for and locate the responsive record, which at \$15/half hour is a fee of \$750. The City's *LA FOIP Request Guidelines for Search* includes the following guidance regarding for where to search for records:

Where to Search?

- Outlook emails and calendars;
- Teams chats/sites;
- SharePoint sites;
- all programs (GP, Pearl, Intelli, etc.);
- paper files;
- notebooks, handwritten notes and sticky notes,
- text messages (including personal phones that contain work related discussions);
- and remember to ask all of team members that may have records, to perform the same searches.

[67] The City referred to its standard in-house guidelines for searching that outlines where searches are generally conducted in the abstract. The difficulty with this is that to rely on this document without further details from the City regarding what files, applications, devices, etc. were specifically searched, we cannot conduct a careful evaluation of the search. We are reduced to an appraisal on basics only. The language of the access request demanded that the following areas be searched: (1) Outlook emails, (2) Teams chats, (3) Sharepoint sites and (4) cell phones. We suggest a search of 3 minutes per employee of these sites. Therefore, four locations x three minutes to search each location x six employees = 72 minutes. These employees may have also searched other locations or paper files, but the City has not given these details.

[68] The City submitted that nine hours of search was attributed to one employee (City Clerk), but not one responsive record was identified in that 9 hour search. Clearly, the search strategy was faulty. Also, as noted, it is reasonable to conclude that responsive records must have been saved in specific files to allow the City to easily retrieve the requested information without additional time. The City also indicated that a fee was not calculated or charged for records previously provided to the Applicant by the City's Employee Relations, though much of what the Applicant requested should arguably be found within its human resources area records holdings, again based on the subject matter.

[69] Our review of the fee calculation will consider 869 pages of responsive records. The employees that conducted the search for records were identified by the City as “subject-matter experts” and therefore are considered to be “experienced employees” for the calculation of a reasonable fee. An experienced employee can visually scan 12 pages of records in one minute. This means that six experienced employees can reasonably scan 869 pages in 72.42 minutes – or 2.41 hours.

[70] The City submitted the search took 25 hours. It has failed to demonstrate how this is reasonable.

b. Reasonableness of the Fee for Preparation

[71] As noted earlier, section 5(3) of the *LA FOIP Regulations* allows for \$15.00 per half hour of preparation time. Preparing a record for disclosure includes the time anticipated to be spent physically severing exempted information from the records. However, preparation time *does not* include time spent:²⁵

- Deciding whether to claim an exemption.
- Identifying records requiring severing.
- Identifying and preparing records requiring third party notice.
- Packaging records for shipment.
- Transporting records to the mailroom or arranging for courier service.
- Time spent by a computer compiling and printing information.
- Assembling information and proofing data.
- Photocopying.
- Preparing an index of records.

²⁵ OIPC [Review Report 252-2024](#) at paragraph [49].

[72] OIPC has set out the following general standards for calculating time spent preparing records for disclosure:²⁶

- The test related to reasonable time spent is generally that an experienced employee should take two minutes per page to physically sever records.
- If the above test does not reflect the circumstances (e.g., the record is complex), the local authority should test a representative sample and apply that time to the whole record.

[73] In its fee estimate for preparing the records for disclosure, the City calculated this fee as 496 records x 5 minutes of review per record = 41 hours, which at \$15/half hour is a fee of \$1,230. We asked the City how it arrived at the estimate of 5 minutes per record. The City stated that this was the “standard estimate to have the Coordinator review, propose redactions, have the Head review, revise and complete redactions.” The City also asserted that the actual time for the Coordinator and head to complete this work was in excess of 60 hours but they were fixing the time at 41 hours.

[74] While the City indicated it took 41 hours to prepare the record, it appears the City calculated this based on actions taken *outside* of the actual physical redacting of the records. The City erred in characterizing the time to conduct the analysis for applying exemptions and the review by the head as part of the “preparation.”

[75] While this office has historically set the reasonable time for an *experienced employee* to physically sever records at two minutes per page, more time for preparation of a record may be warranted in some circumstances. This office concluded that the factors required to assess the time required to prepare records must be assessed on a case-by-case basis. One of the factors this office considers is the level of experience held by the local authority with respect to the preparation of records for disclosure because the traditional practice is to hold the time standard at two minutes with an *experienced employee*.²⁷ Given the limited experience held by the current City Clerk in processing requests, OIPC proposed that, in

²⁶ *Ibid*, at paragraph [50].

²⁷ OIPC [Review Report 328-2025](#) at paragraphs [28] to [30].

this particular case, an average of three minutes per page be applied to prepare the records for disclosure to be reasonable. We note that it is incumbent on every local authority, no matter how small, to become efficient at processing access to information requests and to meet the access to information needs to the community it serves.²⁸

[76] As noted at paragraph [12] of this Report, the City withheld 412 pages of records in part.²⁹ 412 pages x 3 minutes/page = 1,236 minutes or 20.6 hours.

[77] A reasonable fee to search for responsive records in this case would be 2.41 hours x \$15/half hour = \$72.30 and preparing the records for disclosure would be 20.6 hours x \$15/half hour = \$618.00. The total is \$690.30. The City did not charge for the first hour of work, which is consistent with the guidance mandated by section 5(3) of *LA FOIP Regulations* which brings the fee to \$660.30. The fee charged to the Applicant versus the reasonable fee calculated by this office is a difference of \$1,289.70 as follows:

Fee Calculation	City Calculation	OIPC Calculation
Search Fee Calculations	\$750.00	\$72.30
Preparation Fee Calculations	\$1,230.00	618.00
LESS: one hour free of search/preparation	(\$30.00)	(\$30.00)
Total Fee for Applicant	\$1,950.00	\$660.30
Difference between fee calculated by City and OIPC	\$1,289.70	

²⁸ *Ibid*, at paragraph [32].

²⁹ We use the page estimates as provided by the City for the sake of simplicity. OIPC [Review Report 115-2020, 116-2020, 117-2020](#) at paragraphs [66] and [67] provides that the actual cost of the fee for preparation should be based on the number of redacted pages of records provided, not the total number of pages located in its search and that no fee is payable where a record is refused as outlined at section 7 of *LA FOIP Regulations*.

IV FINDINGS

- [78] OIPC has jurisdiction to undertake this review pursuant to PART VI of *LA FOIP*.
- [79] The City properly identified the records listed at paragraphs [39] and [40] as non-responsive to the Applicant's request.
- [80] The City properly applied section 21(a) of *LA FOIP* to the records identified at paragraph [24].
- [81] The City properly applied section 28(1) of *LA FOIP* to the records listed in the table at paragraph [31] this Report, with the exception of the information identified in paragraphs [36] and [37].
- [82] I find that for the seven-page record described at paragraph [38] of this Report, the City properly applied section 28(1) of *LA FOIP* with the exception of the Applicant's own personal information in the two pages of notes
- [83] The City did not demonstrate that a reasonable search was conducted for items 1, 2 and 4 described at paragraph [41] of this Report.
- [84] The fee charged to the Applicant in the amount of \$1,950.00 issued by the City is not reasonable.

V RECOMMENDATIONS

- [85] I recommend that the City continue to withhold the records it identified as non-responsive to the Applicant's access request.
- [86] I recommend that the City continue to withhold the records identified at paragraph [24] of this Report under section 21(a) of *LA FOIP*.

- [87] I recommend that the City continue to withhold the records identified in the table at paragraph [31] of this Report pursuant to section 28(1) of *LAFOIP*, with the exception of the information described in paragraphs [36] and [37] that the City should release to the Applicant within 30 days of the issuance of this Report.
- [88] I recommend that for the seven-page record described at paragraph [38] of this Report, the City continue to withhold the five page report, in full, pursuant to section 28(1) of *LA FOIP*. For the two page notes, I recommend that, within 30 days of the issuance of this Report, the City release the Applicant's own personal information while, continuing to withhold the personal information of other individuals on these two pages pursuant to section 28(1) of *LA FOIP*.
- [89] I recommend that, within 30 days of the issuance of this Report, the City conduct a search for items 1, 2 and 4 described at paragraph [41] of this Report and issue a new section 7 response to the Applicant.
- [90] I recommend that the City, within 30 days of issuance of this Report, refund the Applicant, in part, for the fee charged in the amount of \$1,289.70.

Dated at Regina, in the Province of Saskatchewan, this 17th day of April, 2026.

Grace Hession David
Saskatchewan Information and Privacy Commissioner