



Office of the  
Saskatchewan Information  
and Privacy Commissioner

## **REVIEW REPORT 176-2024**

### **Regina Police Service**

**March 10, 2025**

#### **Summary:**

The Applicant sought information from the Regina Police Service (RPS). RPS withheld records in full or in part pursuant to subsections 13(1)(b), 14(1)(e), (j), (k.2) and 28(1) of *The Local Authority Freedom of Information and Protection of Privacy Act* (LA FOIP). The Applicant asked the A/Commissioner to undertake a review of RPS' decision. During the review, RPS released additional information to the Applicant, thereby dropping its reliance on subsections 14(1)(e) and (k.2) of LA FOIP. The A/Commissioner found that RPS did not properly apply subsection 13(1)(b) of LA FOIP, and that it did not properly apply subsection 28(1) of LA FOIP to some portions but not all. The A/Commissioner also found that subsection 28(1) of LA FOIP would apply to a portion of the records where RPS had applied subsection 13(1)(b) of LA FOIP. Finally, the A/Commissioner found that RPS properly applied subsection 14(1)(j) of LA FOIP. The A/Commissioner recommended that RPS continue to withhold or release records accordingly. Where he recommended release, the A/Commissioner recommended that RPS do so within 30 days of the issuance of this Report. Finally, the A/Commissioner found that RPS met its obligation pursuant to section 8 of LA FOIP for one group of records, but not for a couple other groups. As such, the A/Commissioner recommended that when RPS is first considering withholding a record in full, it does not apply exemptions to non-exempt material, such as header or footer information.

#### **I BACKGROUND**

- [1] On August 28, 2023, the Regina Police Service (RPS) received the applicant's access to information request as follows from the Applicant:

[Case number redacted] – I am requesting all information pertaining to this case starting on August 26, 2015 until September 7, 2015.

- [2] By email to the Applicant on August 29, 2023, RPS confirmed the Applicant paid the \$20.00 application fee. As set out in the Applicant's request, the timeframe for records is August 26, 2015 to September 7, 2015.
- [3] By letter dated September 27, 2023, RPS issued its section 7 decision to the Applicant, stating it was withholding records in full or in part pursuant to subsections 13(1)(b), 14(1)(e), (j), (k.2) and 28(1) of *The Local Authority Freedom of Information and Protection of Privacy Act* (LA FOIP).
- [4] On June 25, 2024, the Applicant asked the Commissioner to undertake a review of RPS' decision.
- [5] On July 18, 2024, my office notified the Applicant and RPS that my office would review RPS' decision to withhold records pursuant to subsections 13(1)(b), 14(1)(e), (j), (k.2) and 28(1) and how it met its obligations under section 8 of LA FOIP.
- [6] On July 29, 2024, the Applicant provided a submission.
- [7] By letter dated September 19, 2024, RPS provided an updated response to the Applicant. RPS stated it was continuing to withhold some pages in full pursuant to subsections 13(1)(b) and 28(1) of LA FOIP, and the remaining records in part pursuant to subsections 14(1)(j) and 28(1) of LA FOIP. On the same date, RPS provided my office with its updated records and index of records, and its submission.

## **II RECORDS AT ISSUE**

- [8] At issue are three groups of records, totaling 62 pages. In its updated section 7 decision to the Applicant dated September 19, 2024, RPS outlined these as follows:
- Group 1: "Case Summary", "Original Report", "Supplementary Reports", "Officer Notes" and "CAD Dispatch Report" – 25 pages withheld in part or in full pursuant to subsections 14(1)(j) and 28(1) of LA FOIP

- Group 2 - “Office of the Sergeant-at-Arms” notes – nine pages withheld in full pursuant to subsection 13(1)(b) of LA FOIP.
- Group 3: “Statements”, “Officer Notes”, “Seized Property Letter”, “Health Records and Request for Health Information” – 28 pages withheld in full pursuant to subsection 28(1) of LA FOIP

[9] For ease of reference, I am referring to the records as Groups 1, 2 and 3; RPS has not described them this way.

[10] Based on RPS’ updated response to the Applicant, it is no longer relying on subsections 14(1)(e) and (k.2) of LA FOIP; therefore, these provisions do not apply to any records under this review.

### **III DISCUSSION OF THE ISSUES**

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

[11] RPS is a “local authority” as defined by subsection 2(1)(f)(viii.1) of LA FOIP. Therefore, I find that I have jurisdiction to conduct this review.

#### **2. Did RPS properly apply subsection 13(1)(b) of LA FOIP?**

[12] RPS withheld the Group 2 records (nine pages) in full pursuant to subsection 13(1)(b) of LA FOIP. RPS described these as notes from the “Office of the Sergeant at Arms.” Subsection 13(1)(b) of LA FOIP provides as follows:

**13(1)** A head shall refuse to give access to information contained in a record that was obtained in confidence, implicitly or explicitly, from:

...

(b) the Government of Saskatchewan or a government institution;

...

unless the government or institution from which the information was obtained consents to the disclosure or makes the information public.

[13] Subsection 13(1)(b) of LA FOIP is a mandatory class-based exemption. It permits refusal of access to information in a record where the information was obtained in confidence, implicitly or explicitly, from the Government of Saskatchewan or a government institution unless there is consent to release or the information was made public. It includes the agencies, Crown corporations and other institutions of the Government of Saskatchewan (*Guide to LA FOIP*, Chapter 4, “Exemptions from the Right of Access”, updated October 18, 2023 [*Guide to LA FOIP*, Ch. 4], p. 21). My office uses the following three-part test to determine if the exemption applies:

1. Was the information obtained from the Government of Saskatchewan or a government institution?
2. Was the information obtained implicitly or explicitly in confidence?
3. Is there consent to disclose the information or has the information been made public?

***1. Was the information obtained from the Government of Saskatchewan or a government institution?***

[14] The *Guide to LA FOIP*, Ch. 4 states at page 22, that the original source of a record must be from the Government of Saskatchewan or its agencies, Crown Corporations or other institutions. In other words, the original source of a record must be the Government of Saskatchewan or a government institution as defined by subsection 2(1)(d) of *The Freedom of Information and Protection of Privacy Act* (FOIP). The information can be obtained either directly or indirectly. “Obtained” in this context means to acquire, get possession of, procure or to get hold of by effort. This provision also applies to “information” that exists in a record rather than to a record; “information” means facts or knowledge provided or learned because of research or study.

[15] In its submission, RPS stated that it obtained the record from the “Sergeant-at-Arms with the Legislative Assembly.” RPS notified the Office of the Sergeant-at-Arms (OSA) that “it intended to give access to the records pursuant to subsection 18(3) of [LA FOIP]” and that it first wanted to give the OSA notice pursuant to section 33 of LA FOIP. In return, the

OSA stated it did not grant permission to share the information (or record) with the Applicant, and it also stated it is not a “government institution” pursuant to FOIP as it is part of the Legislative Assembly Service. RPS provided my office with copies of OSA’s response.

[16] Upon review, the records (or the information in the records) originated with the OSA; that is, the OSA created the records or developed the information in them. OSA provided the records to the RPS as part of an investigation, and so RPS “obtained” the records or the information in the records from the OSA.

[17] Subsection 2(1)(d) of LA FOIP defines “government institution” as follows:

2(1) In this Act:

...

(d) “**government institution**” means a government institution as defined in *The Freedom of Information and Protection of Privacy Act*;

[18] Subsection 2(2) of FOIP excludes bodies from the definition of “government institution” including the Court of King’s Bench, the Legislative Assembly Service and offices of the members of the Legislative Assembly, and Members of Executive Council such as minister’s offices (*Guide to FOIP*, Ch. 1, pg. 8). Subsection 2(2) of FOIP states as follows:

2(2) “**Government institution**” does not include:

...

(b) the Legislative Assembly Service or, subject to subsections 3(3) and (4), offices of members of the Assembly or members of the Executive Council; or

[19] Subsection 70(2)(b) of *The Legislative Assembly Act, 2007*, provides that the OSA is part of the Legislative Assembly Service as follows:

70(2) The Legislative Assembly Service consists of:

...

(b) the Clerk, Clerks-at-the-Table, the **Sergeant-at-Arms** and any other employees that may be required by the Clerk;

[Emphasis added]

[20] Given the above, the OSA is part of the Legislative Assembly Service, and so it would be excluded from the definition of a “government institution” pursuant to subsection 2(2)(b) of FOIP. The first part of the test is not met. As such, I do not have to consider the other parts of the test.

[21] I find that the RPS has not properly applied subsection 13(1)(b) of LA FOIP to the Group 2 records. Prior to making a recommendation on the Group 2 records, I will consider any portions that RPS should withhold as personal information pursuant to subsection 28(1) of LA FOIP later in this Report.

### **3. Did RPS properly apply subsection 28(1) of LA FOIP?**

[22] RPS applied subsection 28(1) of LA FOIP, in part or in full, to the Group 1 and 2 records as follows:

- Group 1 (25-page record) – pages 1 to 10, 12 and 22 (in part); and
- Group 3 (28-page record) – all pages in full.

[23] Subsection 28(1) of LA FOIP states:

**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.

[24] Section 28 of LA FOIP prohibits the disclosure of personal information unless the individual about whom the information pertains consents to its disclosure or if disclosure without consent is authorized by one of the enumerated subsections of 28(2) or section 29 of LA FOIP. Section 28 of LA FOIP applies to information defined at subsection 23(1) of LA FOIP, though the list provided at subsection 23(1) of LA FOIP is not exhaustive. To be personal information, the information must be about an identifiable individual (or the person must be capable/reasonably capable of being identified), and the information must

be personal in nature (*Guide to LA FOIP*, Chapter 6, “Protection of Privacy”, updated February 27, 2023 [*Guide to LA FOIP*, Ch. 6], p. 163).

- [25] For context, it is helpful to understand a bit about the circumstances of the Group 1 and 3 records. The Applicant and another individual have a relationship with (Individual X) and were involved in an incident (the incident) with the OSA. Certain events unfolded requiring various individuals to seek or receive medical attention. There were also some individuals I would describe as witnesses of the incident who provided information about the incident, including of the Applicant and Individual X, to RPS. The portions of the Group 1 records that RPS released to the Applicant reveal that Group 1 contains this type of information.
- [26] For the Group 1 and 3 records, RPS withheld information that it states identifies an individual’s race, creed, name, date of birth, criminal history, address or phone number and information relating to their health care services. RPS also withheld data elements throughout such as the name of the Sergeant-at-Arms and constables associated with the OSA (or who portions of the records identify as “victims”), names of witnesses, and the name of Individual X.
- [27] Before I proceed with my analysis, I will discuss statements made by RPS regarding the status of some individuals involved in the incident, as well as circumstances under which my office has previously found that personal information is not involved. This will affect my findings and recommendations.

***Status of those involved in the incident***

- [28] According to RPS, there are individuals in the records who were victims of assault, and so their names should be withheld as victims of crime pursuant to “sections 11 and 12 of the Victims’ Bill of Rights [sic]” (Canadian Bill). There are several players involved in the incident. Portions of the Group 1 records released to the Applicant reveal that there is either the Sergeant-at-Arms or his Constables involved. The Group 1 records also identify that Legislative Assembly employees were called to assist in the incident.

[29] Sections 11 and 12 of the Canadian Bill state as follows:

**Privacy**

**11** Every victim has the right to have their privacy considered by the appropriate authorities in the criminal justice system.

**Identity protection**

**12** Every victim has the right to request that their identity be protected if they are a complainant to the offence or a witness in proceedings relating to the offence.

[30] Section 2 of the Canadian Bill defines “victim” as follows:

**2** The following definitions apply in this Act.

...

*victim* means an individual who has suffered physical or emotional harm, property damage or economic loss as the result of the commission or alleged commission of an offence.

[31] In its submission, RPS has not argued why these provisions of the Canadian Bill would have paramouncy in this matter over the privacy provisions set out in LA FOIP.

[32] Further, regarding the Canadian Bill, the Ontario Information and Privacy Commissioner (ON IPC) at paragraph [45] of [Order MO-367](#) stated as follows:

[45] Regarding the appellant’s position that section 14(1)(d) applies, which provides for the disclosure of personal information under an Act of Ontario or Canada that expressly authorizes the disclosure, I find that it does not apply in these circumstances. The appellant relies on the *Canadian Victims Bill of Rights*. I find that this law does not apply, **as the investigation was concluded, no charges were laid and there are no proceedings resulting from the incident that forms the subject matter of the record at issue.**

[Emphasis added]

[33] In the Ontario case, it appears the ON IPC indicated that it would not take the Canadian Bill into consideration because the incident at question had concluded and there were no charges or proceedings. As such, there was no victim. In the matter before me, RPS has not laid out such a supporting argument.



- [34] Based on this, I am not persuaded that the Canadian Bill has application to the personal information that may exist in the Group 1 and 3 records and so do not find it applies in the circumstances.

***Circumstances where I have previously found personal information is not involved***

- [35] In past reports, I have stated that it is an absurd result to withhold a record from an individual if they provided the information in the record, were present when the information was given, or it is reasonable that they would otherwise know the information (for example, see my office's [Review Report 061-2024](#) also concerning RPS).
- [36] In past reports, I have also stated that the names and contact information of individuals working in a professional capacity is not personal information. I commented on police members working in their professional and not personal capacity at paragraph [27] of my office's [Review Report 110-2024](#) concerning the Ministry of Corrections, Policing and Public Safety. In my office's [Review Report 155-2022](#), I further commented that if a witness provides factual accounts or information about an incident, including if done so in a professional capacity, that their name is not personal information (see paragraphs [62] to [64] of that report). At paragraph [12] of my office's [Review Report 086-2019](#), concerning the Ministry of Central Services I found that the witness of a signature when used in a professional capacity is not personal information.

***Section 28 analysis on the Group 1 records (withheld in part)***

- [37] RPS withheld the Group 1 records in part pursuant to subsection 28(1) of LA FOIP. For the Group 1 records, I note as follows:
- Because the Applicant and Individual X were involved in the incident together and have a relationship, the Applicant obviously knows the name of Individual X. It would be an absurd result to withhold the name of Individual X from page 1. Also, on page 8, RPS withheld the name of the individual that the Applicant was to be charged with assaulting; the Applicant would be aware of this information, and the person was acting in their professional capacity, and so the information would not be personal information.

- Names of the officers involved in the incident as well as information provided by witnesses and others who work in a professional capacity appear on pages 1 to 3, 4 to 10, 12, 22 and 23. Portions of page 5 disclosed to the Applicant identify that the name of the individual withheld is the “Commissionaire” who works at the “Legislative Building”, while page 6 identifies their coworkers. Page 5 also lists another individual who works at the Legislature. The portion of page 22 disclosed to the Applicant identifies that the caller in the operator log is the “Commissionaire”. Portions of page 12 disclosed to the Applicant reveal the name of the witness being from the “Wascana Centre Authority.” Portions disclosed to the Applicant reveal how they had confronted the Applicant, in their professional capacity, a day prior to the incident. All this information regards individuals working in their professional capacities, and so is not personal information.

[38] I find, that RPS has not properly applied subsection 28(1) of LA FOIP to Group 1 as described above at paragraph [37] of this Report. As such, I recommend it release this information to the Applicant within 30 days of the issuance of this Report.

[39] I do note some exceptions to this in the following three paragraphs. Relevant here are subsections 23(1)(c), (e) and (k)(i) of LA FOIP, which state:

**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:

...

(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

[40] On page 4, portions disclosed to the Applicant reveal that what has been withheld pursuant to subsection 28(1) of LA FOIP regards injuries sustained by one of the officers involved. While the officer’s name would not be personal information, what occurred to them health

wise after the incident would be their personal information as defined by subsection 23(1)(c) of LA FOIP.

[41] On page 9, portions released to the Applicant indicate the withheld portion is about Individual X. It is not apparent that the Applicant would otherwise know the information, and so it would be individual X's personal information as defined by subsection 23(1)(k)(i) of LA FOIP.

[42] On page 12, it appears that the witness from the Wascana Centre Authority submitted their statement using their own personal phone number, email address and home address. It does not appear that the witness would normally use these data elements while performing their duties, and they appear to have submitted their complaint after hours (or from home). This type of information would be their personal information as defined by subsection 23(1)(e) and (k)(i) of LA FOIP.

[43] I find that RPS properly applied subsection 28(1) of LA FOIP to Group 1 as described above at paragraphs [40] to [42] of this Report and recommend it continue to withhold this information pursuant to subsection 28(1) of LA FOIP.

***Section 28 analysis on the Group 3 records (withheld in full)***

[44] RPS withheld the Group 3 records in full pursuant to subsection 28(1) of LA FOIP.

[45] Upon review, pages 1 to 9 contain the health information of another individual as defined by subsection 23(1)(c) of LA FOIP. The Applicant would have no knowledge of the information contained on these pages, and there is no consent to release it. I find that RPS properly applied subsection 28(1) of LA FOIP to pages 1 to 9 of the Group 3 records and recommend that RPS continue to withhold pages 1 to 9 of the Group 3 records pursuant to subsection 28(1) of LA FOIP.

[46] Regarding the remaining pages of the Group 3 records, I note the following where I am not satisfied that personal information is involved:

- Pages 9 and 10 contain handwritten notes regarding the incident in question; there is no personal information on these two pages.
- Page 11 contains a letter to an individual involved in the matter regarding the matter. Except for the recipient's address, which appears to be their home address (which I will address later), the body of the letter appears related to the incident and so is not the recipient's personal information.
- Pages 12 to 28 contain handwritten witness statements by those involved and includes their signatures. The statements are factual statements about the events that occurred. As stated earlier in this Report, this type of information is not personal information.

[47] Based on this, I find that RPS has not properly applied subsection 28(1) of LA FOIP to pages 9 to 28 of the Group 3 records. As noted, however, the letter on page 11 appears to contain the recipient's home address. In the circumstances, they would not be using it for a work-related purpose, and so it would be their personal information as defined by subsection 23(1)(e) of LA FOIP. I recommend that RPS release pages 9 to 28 of the Group 3 records to the Applicant within 30 days of the issuance of this Report but continue to withhold the recipient's home address on page 11 pursuant to subsection 28(1) of LA FOIP.

***Section 28 analysis on the Group 2 records***

[48] The Group 2 records contain notes from the OSA regarding an incident the Applicant was involved in. I previously found that RPS has not properly applied subsection 13(1)(b) of LA FOIP to the Group 2 records, and that I would first consider if there were any personal information in the Group 2 records that should be considered.

[49] The last paragraph on page 9 of the record, which is the last page of the Group 2 records, contains a statement regarding the health status of someone other than the Applicant. This would be the personal information of that individual as defined by subsection 23(1)(c) of LA FOIP, and so I find that subsection 28(1) of LA FOIP would apply to it. Based on this, I recommend that RPS release the Group 2 records to the Applicant within 30 days of the issuance of this Report except for the last paragraph on page 9, which I recommend RPS continue to withhold pursuant to subsection 28(1) of LA FOIP.

**4. Did RPS properly apply subsection 14(1)(j) of LA FOIP?**

[50] RPS applied subsection 14(1)(j) of LA FOIP to pages 18, 21 and 24 of Group 1 records. They describe the withheld portions as “900” codes. Subsection 14(1)(j) of LA FOIP provides as follows:

**14(1)** A head may refuse to give access to a record, the release of which could:

...

(j) facilitate the commission of an offence or tend to impede the detection of an offence;

[51] Page 73 of my office’s *Guide to LA FOIP*, Ch. 4, provides that subsection 14(1)(j) of LA FOIP is a discretionary harm-based exemption. It permits refusal of access in situations where release of a record could facilitate the commission of an offence or impede the detection of one. It also outlines that “could” is somewhat lower than a reasonable expectation that something could occur. The requirement is that release of the information could have the specified result, although there still needs to be a basis for asserting the harm could occur. My office uses the following test to determine if subsection 14(1)(j) of LA FOIP applies; only one question needs to be answered in the affirmative for the exemption to be found to apply:

1. Could release of the record facilitate the commission of an offence?
2. Could release of the record tend to impede the detection of an offence?

[52] RPS submits that it uses 900 codes to “provide quality service and ensure best utilization of our resources.” RPS added that it withholds such information from the public because public knowledge of them could impede an offence by diverting calls for service. RPS adds that 900 codes are encrypted via radio transmission.

[53] In multiple previous reports (e.g., my office’s [Review Report 095-2024](#) at paragraph [18] and [Review Report 061-2024](#) at paragraph [19]), I took the position that subsection 14(1)(j) of LA FOIP applies to such codes. I continue with this position and find that RPS properly

applied subsection 14(1)(j) of LA FOIP to the 900 codes on pages 18, 21 and 24 of the Group 1 records, and recommend that RPS continue to withhold them pursuant to subsection 14(1)(j) of LA FOIP.

**5. Did RPS meet its obligations under section 8 of LA FOIP?**

[54] Section 8 of LA FOIP states as follows:

**8** Where a record contains information to which an applicant is refused access, the head shall give access to as much of the record as can reasonably be severed without disclosing the information to which the applicant is refused access.

[55] “Severability” is the principle described in section 8 of LA FOIP requiring that information be disclosed if it does not contain, or if it can be reasonably severed from, other information that the head of a local authority is authorized or obligated to refuse to disclose under the Act. “Severing” is the exercise of blacking out exempt portions of a record and disclosing the remaining portions. A line-by-line review is essential to comply with the principle of severability set out in section 8 of LA FOIP. (*Guide to LA FOIP*, Chapter 3, “Access to Records”, updated May 5, 2023 [*Guide to LA FOIP*, Ch. 3], pp. 67 and 70).

[56] Regarding section 8 of LA FOIP, RPS stated that it provided the Applicant with information it determined the Applicant was entitled to receive except for personal information that belonged to other people. RPS also cited that in an updated response to the Applicant, it released additional information, thereby dropping its reliance on subsections 14(1)(e) and (k.2) of LA FOIP.

[57] I acknowledge that RPS did drop its reliance on a couple exemptions and released additional information to the Applicant. RPS also disclosed portions of Group 1, taking into consideration where it felt information should be withheld based on subsections 14(1)(j) and 28(1) of LA FOIP. This demonstrates that RPS did turn its mind towards what information in the Group 1 records it could release, and I find that it met its obligation pursuant to section 8 of LA FOIP for the Group 1 records.

[58] I would add that if a local authority first impulse is to withhold records in full, such as RPS did with the Groups 2 and 3 records, it should always consider what portions it can release if there is no identified harm in releasing them and if no exemptions apply. This includes portions of a record that may help confirm with an applicant the type of record being withheld. RPS, for example, outlined to the Applicant in its updated section 7 decision dated September 19, 2024, that the Group 2 records contain “Sergeant-at-Arms Incident Reports”, and so reasonably the Applicant would already know that’s the type of information being withheld in the Group 2 records. Releasing header information on these pages, such as report title names and dates, would at least confirm this with the Applicant. The same rationale applies for the Group 3 records.

[59] Because of this, I find that RPS did not meet its obligation pursuant to section 8 for the Groups 2 and 3 records. To meet its obligations pursuant to section 8 of LA FOIP, I recommend that when RPS intends to withhold a record in full, it considers what parts of a record, such as header or footer information, it can release that would confirm for the applicant the type of records being withheld. This would help it meet its obligations pursuant to section 8 of LA FOIP.

#### **IV FINDINGS**

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

[61] I find that RPS has not properly applied subsection 13(1)(b) of LA FOIP to the Group 2 records but that subsection 28(1) of LA FOIP would apply to the last paragraph on page 9 of the Group 2 records.

[62] I find that RPS did not properly apply subsection 28(1) of LA FOIP to the Group 1 records as outlined at paragraph [37] of this Report and to pages 9 to 28 of the Group 3 records except for the recipient’s home address on page 11; subsection 28(1) of LA FOIP applies to the recipient’s home address on page 11 of the Group 3 records.

[63] I find that RPS properly applied subsection 28(1) of LA FOIP to the Group 1 records as outlined at paragraphs [40] to [42] of this Report.

[64] I find that RPS properly applied subsection 14(1)(j) of LA FOIP to the “900” codes on pages 18, 21 and 24 of the Group 1 records.

[65] I find that RPS met its obligation pursuant to section 8 for the Group 1 records, but not for the Group 2 and 3 records.

## **V RECOMMENDATIONS**

[66] I recommend that RPS release the Group 2 records to the Applicant within 30 days of the issuance of this Report except for the last paragraph on page 9, which I recommend that RPS continue to withhold pursuant to subsection 28(1) of LA FOIP.

[67] I recommend that RPS release to the Applicant within 30 days of the issuance of this Report the information from the Group 1 records as outlined at paragraph [37] of this Report and pages 9 to 28 of the Group 3 records except for the recipient’s home address on page 11, which I recommend that RPS continue to withhold pursuant to subsection 28(1) of LA FOIP.

[68] I recommend that RPS continue to withhold the Group 1 records as outlined at paragraphs [40] to [42] of this Report.

[69] I recommend that RPS continue to withhold the “900” codes on pages 18, 21 and 24 of the Group 1 records pursuant to subsection 14(1)(j) of LA FOIP.

[70] I recommend that when RPS intends to withhold a record in full, it considers what parts of a record, such as header or footer information, it can release that would confirm for the applicant the type of records being withheld. This would help it meet its obligations pursuant to section 8 of LA FOIP.



Dated at Regina, in the Province of Saskatchewan, this 10<sup>th</sup> day of March, 2025.

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