



## **REVIEW REPORT 268-2025**

### **Rural Municipality of Reford No. 379**

**June 1, 2026**

#### **Summary:**

The Applicant submitted an access to information request to the Rural Municipality of Reford No. 379 (RM) for a copy of the Public Disclosure Statements of all seven current sitting members of council of the RM.

The RM provided the Applicant with the seven Public Disclosure Statements completed and signed by RM council members, withheld in part under section 28(1) (third party personal information) of *The Local Authority Freedom of Information and Protection of Privacy Act (LA FOIP)*.

The Applicant requested that the Office of the Saskatchewan Information and Privacy Commissioner review the exemption applied by the RM.

The Commissioner found that the RM properly applied section 28(1) of *LA FOIP* to the records. The Commissioner recommended that the RM continue to withhold the redacted information.

#### **I BACKGROUND**

[1] On March 10, 2025, the Applicant submitted the following access to information request to the Rural Municipality of Reford No. 379 (RM):

I request a copy of the Public Disclosure statements of all current sitting members of Council of the R.M. OF REFORD.

[2] On March 19, 2025, the Applicant paid the \$20.00 application fee.

- [3] On April 2, 2025, the RM provided a section 7 decision letter to the Applicant, informing them that the responsive records were being withheld in part pursuant to the mandatory exemption in section 28(1) of *The Local Authority Freedom of Information and Protection of Privacy Act (LA FOIP)*.<sup>1</sup>
- [4] On October 25, 2025, the Applicant requested a review of the application of the exemption by the Office of the Saskatchewan Information and Privacy Commissioner (OIPC).
- [5] On March 5, 2026, OIPC notified the RM and the Applicant that this office would be undertaking a review of the decision by the RM to withhold portions of the records under section 28(1) of *LA FOIP*. OIPC requested that the RM provide a copy of the record at issue and an index of records by April 4, 2026. Both parties were invited to provide submissions by May 4, 2026.
- [6] On April 3, 2026, the RM provided a copy of the record at issue and an index of records to OIPC.
- [7] On April 7, 2026, the RM gave OIPC permission to share the index of records with the Applicant. OIPC did so on April 8, 2026.
- [8] On April 9, 2026, the Applicant emailed a copy of their submission to OIPC.
- [9] On April 23, 2026, the RM informed OIPC they were willing to release previously redacted portions of the records to the Applicant, in a good faith effort to informally resolve the matter.
- [10] On April 24, 2026, the RM released additional portions of the records to the Applicant. On the same day, the Applicant emailed OIPC that they wished to continue with the review.

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<sup>1</sup> [\*The Local Authority Freedom of Information and Protection of Privacy Act\*](#), SS 1990-91, c. L-27.1, as amended.

Also on April 24, 2026, OIPC emailed the Applicant and RM separately to confirm that the review would continue.

[11] On May 4, 2026, the RM provided OIPC with a submission.

## **II RECORDS AT ISSUE**

[12] The RM released seven records, all Public Disclosure Statements completed and signed by the RM council members. Withheld from the Public Disclosure Statements were the council members' postal box numbers and the Saskatchewan Assessment Management Agency identification numbers (owner numbers) under section 28(1) of *LA FOIP*.<sup>2</sup>

## **III DISCUSSION OF THE ISSUES**

### **1. Jurisdiction**

[13] The RM is a "local authority" pursuant to section 2(1)(f)(i) of *LA FOIP*. Therefore, OIPC has jurisdiction to conduct a review of this matter under PART VI of *LA FOIP*.

### **2. The application of the exemption in section 28(1) of LA FOIP**

[14] Section 28(1) of *LA FOIP* prohibits the disclosure of personal information of individuals unless the individual about whom the information pertains consents to its disclosure. Section 28(1) of *LA FOIP* provides:

#### **Disclosure of personal information**

**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

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<sup>2</sup> [Saskatchewan Assessment Management Agency](#) (SAMA) provides a stable up-to-date property assessment system for Saskatchewan. They develop assessment policy and standards, conduct property valuation services, audit assessed values, and confirm municipal assessment rolls. SAMA identification numbers (frequently referred to as "owner numbers") are numbers assigned to individuals when they come to be in possession of land within the RM. In this case, the withheld information is the owner numbers associated with council members.

individual to whom the information relates except in accordance with this section or section 29.

[15] 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.<sup>3</sup>

[16] As noted above, the RM applied section 28(1) of *LA FOIP* to parts of the Public Disclosure Statements of the seven RM councillors. The withheld portions included:

- *Postal box numbers*: The personal postal box numbers were withheld, but community, province and postal code were released where present.
- *Owner numbers*: that owner numbers are identifying numbers used by municipal organizations to identify ratepayers.

[17] In the submission provided May 4, 2026, the RM asserted:

The RM redacted certain personal information from the Records in accordance with ss.23(1)(d) and 23(1)(e) of *LA FOIP* which provide that:

...

The RM submits the personal information redacted from the Records was either:

- An identifying number assigned to the individual; or
- The home address of an individual (the “**Personal Information**”).

[Emphasis in original]

[18] This office reviewed the record and we confirm that the withheld portions as described above constitute personal information pursuant to sections 23(1)(d) and (e) of *LA FOIP* as follows:

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<sup>3</sup> OIPC [Review Report 108-2025](#) at paragraph [33].

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:

...  
(d) any identifying number, symbol or other particular assigned to the individual;

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

[Emphasis added]

[19] With that in mind, this office must consider the Applicant’s argument which focuses on the concept of public examination rather than the nature of the information subject to the exemption:

The records requested are Public Disclosure statements of elected council members. Each of these forms states that they are available for public examination. For example, the declaration sections indicate that the forms are intended to be accessible to the public. These are not private records in the usual sense. They are documents created specifically for transparency and accountability in municipal governance.

[Emphasis added]

[20] The Applicant also submitted that section 116(3) of *The Municipalities Act*<sup>4</sup> provides that these disclosure statements are public documents available for inspection.”

[21] We note that section 116(3) of *The Municipalities Act* is irrelevant to this analysis because it has nothing to do with public release or inspection of municipal documents.<sup>5</sup> Section 142 of *The Municipalities Act* requires that council members file a public disclosure statement within 30 days of being elected. This obligation involves a public disclosure statement that outlines the municipal address or legal description of any property located in the

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<sup>4</sup> [The Municipalities Act](#), S.S. 2005, c. M-36.1., as amended.

<sup>5</sup> Section 116(3) of *The Municipalities Act* reads: “Municipal documents may, with the consent of the Provincial Archives of Saskatchewan, be deposited with the Provincial Archives of Saskatchewan for preservation in the archives.”

municipality owned by the member. The public disclosure statements must be available for a person to attend at any time and inspect during normal business hours:

**142(1)** Subject to the regulations, every member of council shall, within 30 days after being elected, file a public disclosure statement with the administrator in the form provided by the council.

(2) A public disclosure statement required pursuant to subsection (1) must contain:

(a) the name of:

(i) every employer, person, corporation, organization, association or other body from which the member of council or someone in the member's family receives remuneration for services performed as an employee, director, manager, operator, contractor or agent;

(ii) each corporation in which the member or someone in the member's family has a controlling interest, or of which the member or someone in the member's family is a director or senior officer;

(iii) each partnership or firm of which the member of council or someone in the member's family is a member; and

(iv) any corporation, enterprise, firm, partnership, organization, association or body that the member of council or someone in the member's family directs, manages, operates or is otherwise involved in that:

(A) transacts business with the municipality;

(B) the council considers appropriate or necessary to disclose; or

(C) is prescribed;

(b) the municipal address or legal description of any property located in the municipality or an adjoining municipality that is owned by:

(i) the member of council or someone in the member's family; or

(ii) a corporation, incorporated or continued pursuant to *The Business Corporations Act, 2021* or the *Canada Corporations Act*, of which the member or someone in the member's family is a director or senior officer or in which the member or someone in the member's family has a controlling interest;

(c) the general nature and any material details of any contract or agreement involving the member of council or someone in the member's family that could reasonably be perceived to be affected by a decision, recommendation or action of the council and to affect the member's impartiality in the exercise of his or her office; and

(d) any other prescribed information or contents.

(5) The administrator shall:

...

(b) make each public disclosure statement filed pursuant to subsection (1) and each declaration submitted pursuant to subsection (3) available for public inspection during normal business hours; and

[Emphasis added]

[22] Section 117(1)(b) of *The Municipalities Act* re-states the right of individuals to attend a municipal office at any time during regular business hours to inspect and obtain copies of documents filed pursuant to section 142 of *The Municipalities Act*:

**117(1) Any person is entitled at any time during regular business hours to inspect and obtain copies of:**

...

(b) the statements maintained by the administrator in accordance with section 142 and the debentures register;

[Emphasis added]

[23] The public must be able to attend, inspect and make copies of public disclosure documents in order to ensure that municipal councillors have properly discharged their duty to publicly report remuneration received or positions held for outside interests as imposed by section 142 of *The Municipalities Act*. Members of the community must be informed and assured there are no outstanding conflict of interest issues. A similar situation arose for the Office of the Information and Privacy Commissioner, Newfoundland and Labrador.<sup>6</sup>

[26] As the Complainant has persuasively argued in their submissions (see paragraph 18, above) public disclosure statements are the mechanism by which a member of the public can verify that Members of the House of Assembly have

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<sup>6</sup> [NL OIPC Report A-2006-007](#), at paragraph [26].

discharged their statutory conflict of interest obligations. Ensuring that citizens have the information required to participate meaningfully in the democratic process, and increasing transparency in government, are fundamental purposes of access to information legislation, as stated in section 3 of *Access to Information and Protection of Privacy Act*, 2015.

[24] The Public Disclosure Statements were completed and signed by RM council members as part of the fulfillment of their responsibilities when they assumed their position with the municipality. [\*The Public Disclosure Guide for Saskatchewan Municipalities\*](#) explains that Public Disclosure Statements, once completed and filed with the administrator, are public documents and accessible to anyone wishing to inspect or view them.

[25] *LA FOIP* and *The Municipalities Act* interact together to protect the personal information of individuals but to also ensure that public duties are met pursuant to the requirements of other provincial legislation. This is established in section 4 of *LA FOIP*:

**4 This Act:**

(a) complements and does not replace existing procedures for access to information or records in the possession or under the control of a local authority;

(b) does not in any way limit access to the type of information or records that is normally available to the public;

[26] This is further supported by section 28(2)(i)(i) of *LA FOIP* which allows for disclosure of personal information when authorized by another Act or regulation:

**28(2)** Subject to any other Act or regulation, personal information in the possession or under the control of a local authority may be disclosed:

...

(i) for the purpose of complying with:

(i) an Act or a regulation;

[27] The RM submitted that the data elements withheld in this instance do not fall into the category of mandatory informational requirements essential to the Public Disclosure Statements:

The key point to acknowledge with respect to the Postal Addresses [postal box numbers] and Owner Numbers, is these are not property included in the Mandatory Information required to be made available for the public under section 142(2), 142(5) and 117 of *The Municipalities Act*; therefore, the Owner Numbers and Postal Addresses are properly dealt with within the scope of LA FOIP. The RM is under no obligation to disclose the Postal Addresses, or the Owner numbers, because section 142(2), 142(5), and sections 117(2), only apply to the Mandatory Information. The Postal Addresses and Owner numbers are not required to be provided in the public disclosure statements, and therefore, *The Municipalities Act* does not apply to mandate its availability to the public.

[28] OIPC agrees with the RM's submission. Owner numbers are also not required for the purposes of Public Disclosure Statement. This is further supported by the Government template Form 1<sup>7</sup> which does not include a requirement for a mailing address (postal box numbers) or owner numbers. These items are irrelevant to possible conflict of interest issues and constitute personal information that identifies an individual. We conclude that postal box numbers and owner numbers are not covered by section 142 of *The Municipalities Act* and qualify as personal information under section 23(1)(d) and (e) of *LA FOIP*. Postal box numbers and owner numbers should continue to be withheld under section 28(1) of *LA FOIP*. The RM has fulfilled its duty to the rate payers in the municipality by releasing the mandatory information included in the Public Disclosure Statements.

#### **IV FINDINGS**

[29] OIPC has jurisdiction to undertake this review pursuant to PART VI of *LA FOIP*.

[30] The RM properly applied section 28(1) of *LA FOIP* to the redacted portions of the record. The postal box numbers and owner numbers constitute personal information.

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<sup>7</sup> [The Government of Saskatchewan Publications](#) website has a sample template of a [Municipal Public Disclosure Statement](#). It is important to note that on Form 1 of the Public Disclosure Statement template, the council member is only required to provide their name and municipal address/legal description of any property. Council members are not required to provide their mailing address or owner numbers.

**V RECOMMENDATION**

[31] I recommend that the RM continue to withhold the information redacted in the record, the postal box numbers and owner numbers pursuant to the exemption in section 28(1) of *LA FOIP*.

Dated at Regina, in the Province of Saskatchewan, this 1<sup>st</sup> day of June, 2026.

Grace Hession David  
Saskatchewan Information and Privacy Commissioner