



Office of the
Saskatchewan Information
and Privacy Commissioner

REVIEW REPORT 270-2025

Rural Municipality of Reford No. 379

October 6, 2026

Summary:

The Applicant submitted an access to information request to the Rural Municipality of Reford No. 379 (RM) for records relating to a grader accident. The Village released the requested records, withholding portions pursuant to 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 decision of the RM to refuse access to the withheld portions of the responsive record.

The Commissioner found that the RM properly applied section 28(1) of *LA FOIP* to the redacted portions of the responsive record.

The Commissioner recommended that the RM continue to withhold the redacted portions of the responsive record.

I BACKGROUND

[1] On September 14, 2025, the Rural Municipality of Reford No. 379 (RM) received an access to information request from the Applicant for the following records:

I am requesting access to the records relating to the grader accident involving an RM employee and a private citizen between June 1, 2025 and August 14, 2025 on the LEIPZIG-LANDIS ROAD:

- 1) The Foreman's Report regarding this incident;
- 2) The Toolbox Meeting notes, safety meeting minutes, or other safety documentation where this accident was discussed;
- 3) The certification of the grader operator; and

4) The road report (map) for the LEIPZIG-LANDIS ROAD dated the day of the accident.

- [2] On September 15, 2025, the Applicant paid the \$20 application fee. On September 29, 2025, the RM emailed a letter to the Applicant, which stated:

Certain records you have requested may contain third party information subject to confidentiality provisions in subsection 18(1) of *The Local Authority Freedom of Information and Protection of Privacy Act*. However, pursuant to subsection 18(3) of the Act a decision may be made to give access to one or more of the records subject to hearing any objections the third party may have. Therefore, we have given notice to the affected third party as required under section 33 of the Act. The third party has until 20 days after receiving our notice, which is approximately October 16, 2025, to provide our office with representations why access to the records should not be given.

- [3] On October 21, 2025, the RM emailed the Applicant a copy of its section 7 decision letter and released portions of the requested records. In the section 7 decision letter, the RM advised it was granting partial access to the requested records, withholding portions pursuant to section 28(1) of *The Local Authority Freedom of Information and Protection of Privacy Act (LA FOIP)*.¹

- [4] On October 26, 2025, the Applicant emailed the Office of the Saskatchewan Information and Privacy Commissioner (OIPC) requesting a review of the decision of the RM to refuse access to the withheld portions of the responsive records.

- [5] On March 30, 2026, OIPC notified the RM and the Applicant that a review would commence.

- [6] On April 29, 2026, the RM provided OIPC with a copy of the records and index of records (index). On May 29, 2026, the RM provided this office with its submission.

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

- [7] On June 23, 2026, the RM released license plate information from one of the requested records that was previously withheld pursuant to section 28(1) of *LA FOIP*. The RM also provided the Applicant with an updated index that described the information withheld in each of the redactions applied to the records. On June 23, 2026, the RM provided this office with an updated copy of the records and an updated index. On July 6, 2026, with permission from the RM, this office shared the RM's submission with the Applicant. The Applicant responded to this office on the same day and continued to express concerns with the application of exemptions by the RM.²

II RECORDS AT ISSUE

- [8] There are four records at issue totalling 35 pages. All 35 pages were partially withheld by the RM pursuant to section 28(1) of *LA FOIP*. The RM described the four records at issue as follows:

- Record #1: Incident reports (2 pages)
- Record #2: Incident communications (2 pages)
- Record #3: Certifications (30 pages)
- Record #4: Map (1 page)

- [9] On June 23, 2026, OIPC received an email from the Applicant who indicated that they were not interested in “certificate numbers, home addresses, personal contact information, employment history, or other personal details”. On July 6, 2026, the Applicant responded by saying that they were not interested in “health information, marital status, home addresses, personal contact information, certification nor registration numbers, employment history unreleased to the incident and other similar personal information” but neglected to list specific pages or redaction numbers. As a result, we must consider all redactions applied under section 28(1) of *LA FOIP*.

² The Applicant provided documentation that as of June 23, 2026, an authorized representative would act on their behalf.

III DISCUSSION OF THE ISSUES

1. Jurisdiction

[10] The RM qualifies as a “local authority” under 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 the mandatory exemptions in section 28(1) of *LA FOIP*

[11] The RM’s index provided the following helpful information regarding the portions of the records it denied access pursuant to section 28(1) of *LA FOIP*:

Record	Page	Redaction numbers	<i>LA FOIP</i> Exemption(s) applied	Description of redacted information
1	1	1 to 16 ³	23(1)(a), (c), (k), 28(1) of <i>LA FOIP</i>	Name, information relating to sex of individual, healthcare received, family status of individual
1	2	1	23(1)(k), 28(1) of <i>LA FOIP</i>	Name
2	1	1	23(1)(k), 28(1) of <i>LA FOIP</i>	Name
2	2	1 to 2	23(1)(k), 28(1) of <i>LA FOIP</i>	Name
3	1	1 to 5	23(1)(b), (d), (k), 28(1) of <i>LA FOIP</i>	Name, identifying number, identifying/traceable information related to employment
3	2	1 to 11	23(1)(b), (d), (k), 28(1) of <i>LA FOIP</i>	Name, identifying number, identifying/traceable information related to employment
3	3	1 to 2	23(1)(b), (k), 28(1) of <i>LA FOIP</i>	Name, identifying/traceable information related to employment

³ Record 1, page 1 contains 17 redactions, however it seems the RM failed to number one of the redactions so there are 17 redactions and not 16.

3	4	1 to 3	23(1)(b), (e), (k), 28(1) of <i>LA FOIP</i>	Name, employment history/address
3	5	1 to 3	23(1)(k), 28(1) of <i>LA FOIP</i>	Name, identifying/traceable information related to employment
3	6	1 to 5	23(1)(b), (d), (k), 28(1) of <i>LA FOIP</i>	Name, identifying number, identifying/traceable information related to employment
3	7	1 to 4	23(1)(b), (k), 28(1) of <i>LA FOIP</i>	Name, identifying/traceable information related to employment
3	8	1 to 3	23(1)(b), (k), 28(1) of <i>LA FOIP</i>	Name, employment history
3	9	1 to 4	23(1)(b), (k), 28(1) of <i>LA FOIP</i>	Name, employment history
3	10	1 to 3	23(1)(b), (k), 28(1) of <i>LA FOIP</i>	Name, identifying/traceable information related to employment
3	11	1 to 4	23(1)(b), (k), 28(1) of <i>LA FOIP</i>	Name, employment history
3	12 to 13	1 to 5	23(1)(b), (k), 28(1) of <i>LA FOIP</i>	Name, employment history
3	14 to 16	1 to 3	23(1)(b), (k), 28(1) of <i>LA FOIP</i>	Name, employment history
3	17 to 18	1 to 5	23(1)(b), (d), (k), 28(1) of <i>LA FOIP</i>	Name, identifying number, identifying/traceable information related to employment
3	19	1 to 4	23(1)(b), (k), 28(1) of <i>LA FOIP</i>	Name, employment history/identifying/traceable information
3	20 to 30	1 to 4	23(1)(b), (d), (k), 28(1) of <i>LA FOIP</i>	Name, identifying number, identifying/traceable information related to employment
4	1	1	23(1)(k), 28(1) of <i>LA FOIP</i>	Name

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

[13] 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 be about an identifiable individual; and be personal in nature.⁴ Information is about an identifiable individual if: the individual can be identified from the information (e.g., name, where they live), or the information, when combined with information otherwise available, could reasonably be expected to allow the individual to be identified.⁵ “Personal in nature” means personal to a particular person or their private life, and not to their professional one.⁶

[14] The Applicant noted the following about the records they sought to access:

[The Applicant’s] objective is not to obtain personal information about RM employees. [They] seek sufficient information to identify the municipal employees acting in their official capacities and to determine whether the operator involved in the incident possessed valid qualifications at the time of the incident.

Accordingly, [the Applicant] continues to seek review of the following redactions:

1. The identity of the grader operator involved in the incident.
2. The identity of the RM Foreman who reviewed the incident, communicated with the RCMP, authored the Foreman’s Report, and reached the operational conclusion regarding compliance with RM and road policy.

⁴ OIPC [Review Report 108-2025](#) at paragraph [33].

⁵ OIPC [Review Report 090-2025](#) at paragraph [27].

⁶ OIPC [Review Report 085-2021](#) at paragraph [47].

3. With respect to the certification records, [the Applicant] does not seek access to certificate numbers or other personal information. Rather, [they] seeks only sufficient information to determine whether the operator involved in the incident possessed the qualifications required to operate the grader at the time of the incident. Without the operator's identity and the information necessary to determine whether the certifications were valid at the time of the incident, [they are] unable to determine whether the disclosed certifications relate to the operator involved.

[The Applicant] respectfully submits that there is an important distinction between information relating to an employee's private life or employment history and information relating solely to municipal employees carrying out their official public duties.

The grader operator was operating municipal equipment on a public roadway in the course of municipal employment. Likewise, the RM Foreman was acting in an official supervisory capacity when reviewing the incident, communicating with the RCMP, preparing the Foreman's Report, and reaching operational conclusions regarding compliance with RM policy.

[The Applicant] respectfully questions whether the identities of municipal employees performing these official functions should properly be characterized as personal information within the meaning of section 23 of LA FOIP.

Similarly, [the Applicant] respectfully submits that there is a distinction between an employee's employment history and information necessary to determine whether a municipal employee performing public duties possessed valid qualifications to perform those duties at the relevant time.

[Emphasis added]

[15] In its submission, the RM stated the following regarding the release of records and the portions withheld:

The RM notes that the Applicant has been provided with the substantive, non-personal details of the incident, including the nature of the occurrence, the location, and responsive records. The withheld information does not advance transparency into the RM's operations but instead concerns the personal information of identifiable individuals.

...

The Records relate directly to a specific workplace incident involving identifiable municipal employees. As a result, much of the information at issue reveals information about those individuals' employment, job performance, qualifications, or involvement in a workplace investigation, all of which falls within s. 23(1)(b).

- [16] The RM identified that the withheld portions of the records qualify as personal information pursuant to sections 23(1)(a), (b), (c), (d), (e) and (k) of *LA FOIP*. These sections state as follows:

Protection of Privacy - Interpretation

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;

(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;

...

(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.

Record #3 Certifications

- [17] Record #3 is 30 pages and consists of copies of various certificates of training and/or certifications of an individual. The RM released portions that identify the type of training/certification, withholding details in 66 redactions including: the name of the individual who received the training and/or certification; certification/certificate/registration/reference numbers; certification/training/course dates

or date of completion; certification issuance and/or expiry dates and the names and/or signatures of trainers/instructors or the names and professional contact information of trainers/instructors and the other representatives that signed the certificates.

[18] The names and/or signatures and professional contact information of trainers/instructors and other representatives that signed the certificates qualify as personal information pursuant to section 23(1)(e) and (k)(i) of *LA FOIP*. In two instances, on pages 1 and 6, the name of a representative who signed the certificate is followed by a job title. While this office has previously found job titles to not qualify as personal information, in this instance the release of the job titles alone is so uniquely identifying that it would surely reveal the identity of the individual. These two job titles qualify as personal information. This information should not be disclosed unless it is publicly available or consent has been granted for the dissemination – neither of which was made known to this office.⁷

[19] We are satisfied that the names and professional contact information of the trainers/instructor and other representatives that signed the certificates, as well as the two job titles on pages 1 and 6, qualify as personal information and should continue to be withheld under section 28(1) of *LA FOIP*.

[20] OIPC has previously found that information pertaining to an individual’s specialty training qualifies as “education history” pursuant to the definition of personal information at section 23(1)(b) of *LA FOIP*.⁸ The RM should also continue to withhold the remaining data elements found in Record #3 under section 28(1) of *LA FOIP*

⁷ [*Schiller v Government of Saskatchewan \(Ministry of Education\)*](#), 2025 SKKB 146 at paragraphs [27] to [35]; OIPC [Review Report 187-2025](#) at paragraph [33].

⁸ OIPC [Review Report 078-2025](#) at paragraph [51]. See also [Order P-845](#) (January 23, 1995), wherein the Office of the Ontario Information and Privacy Commissioner (ON OIPC) found that personal information includes names, certificate number, dates of certification and certification expiry dates under Ontario’s equivalent legislation.

Record #1 Incident Reports
Record #2 Incident Communications
Record # 4 Map

- [21] Record #1 is two pages. Portions released to the Applicant describe the first page as an “Incident Report” , the second page is an “Incident Follow Up Report.” The RM applied 18 redactions to these pages as follows: five redactions were applied to names of individuals including a signature for one of the individuals; nine redactions refer to an individual’s gender pronouns; three redactions were applied to an individual’s health care related information; and one redaction was applied to an individual’s marital status.
- [22] Record #2 consists of two pages. These two pages involve a string of messages between RM employees regarding the accident. There are three photos attached. The RM applied five redactions to the names of each individual. Four redactions were applied to the name of the sender of the message in the message header, and one redaction was applied to the name of the individual to whom the incident report was submitted.
- [23] Record #4 is a one-page grading map, to which the RM applied one redaction to the name of an individual.
- [24] Most of the redactions in Records #1, #2 and #4 are names of individuals, other than the Applicant. The names form the subject matter of the discussion regarding the accident. The Applicant questioned if the information could qualify as personal information if the individuals were acting in their professional capacity. The Office of the Information and Privacy Commissioner of Ontario (ON OIPC) considered a decision to refuse access to portions of officer notes relating to a motor vehicle accident between the appellant and the driver of a taxi. The Ontario adjudicator found that the information qualified as personal information and upheld the decision to refuse access to the information.⁹

[22] Even if information relates to an individual in a professional, official or business capacity, it may still qualify as personal information if the information reveals something of a personal nature about the individual. Based on my review of the information at issue, I find that that is the case here.

⁹ ON OIPC [Order MO-3977](#) (November 27, 2020) at paragraphs [19] to [23] and [44] to [47].

...

[47] In my view, the presumption at section 14(3)(d) (employment or educational history) also applies. A person's name and professional title, without more, does not constitute "employment history." However, in this case, based on my review of the information withheld, I find that it goes beyond a person's name and professional title. The information withheld relates to and reveals an affected party's involvement in a vehicle collision while working as a taxi driver. I find that this is highly relevant to the work history of the individual involved, given the nature of their employment...

[Emphasis added]

[25] We adopt the Ontario position and conclude that the release of the name of the individuals in these records would be highly relevant to their work history and thus qualifies as employment history pursuant to section 23(1)(b) of *LA FOIP*. As it is personal information, it should continue to be withheld pursuant to section 28(1) of *FOIP*.

[26] Along with the names of individuals, the RM also withheld data elements that describe the sex, gender pronouns, marital status and health care related information of these individuals. These data elements qualify as personal information and should continue to be withheld under section 28(1) of *LA FOIP*, as outlined below:

Record #1

- Page 1: Redactions 1 and 16 are the name of the individual involved in the motor vehicle accident. This office has previously found that the fact an individual was involved in an accident to be personal information.¹⁰
- Page 1: Redactions 3 to 15 (and one other redaction that was not numbered by the RM) are the name of an individual, details about sex, gender pronouns,¹¹ marital status,¹² and health care related information, all of which constitute personal information.¹³

¹⁰ OIPC [Investigation Report 096-2018](#) at paragraphs [16] to [19].

¹¹ In OIPC [Review Report 064-2025](#) at paragraph [27], this office found that the name, sex and gender pronoun of an individual other than the Applicant withheld from an officer's statement of a motor vehicle accident qualified as personal information.

¹² In OIPC [Investigation Report 319-2017](#) at paragraph [7], this office found that information and an individual family and marital status qualified as personal information.

- Page 1: redaction 2 refers to the name of an individual's property used to describe the location of the motor vehicle accident. This would reveal them as the owner of the property, which is their personal information.¹⁴
- Page 2: Redaction 1 is the name and signature of the individual who prepared the follow up report after discussing the accident with the individual involved in the accident. They were not a party to the accident, but the follow up report contains the employment history of the individual who was involved in the accident.¹⁵ When considering if an individual could be identified from the release of information in a record, a local authority must consider if the information could identify the individual when combined with other available sources of information or due to the context in the record. Due to the details released in the record, and because it occurred in a small community, residents may be able to identify who was involved in the accident, and thus their employment history, if the name of the person who prepared the follow up report was released.¹⁶
- The name of the individual that prepared the follow up report was also redacted in Record #2 on page 1, redaction 2. The release of the name of this individual would reveal the identity of the individual involved in the accident and should continue to be withheld.

Record #2

- Page 1: redaction 1 is the name of the individual involved in the motor vehicle accident. Their name is found on Page 2, redactions 1 to 3. The release of the name of this individual would reveal the identity of the individual involved in the accident, which I found above qualifies as personal information and should continue to be withheld.
- Page 1: redaction 2 contains the name of the person who prepared the follow up report. We have said that disclosure of their name could reasonably identify the individual who was involved in the accident, which is that person's employment history.

¹³ In OIPC [Review Report 039-2020](#) at paragraph [30], this office found that health information of an identifiable individual and records documenting alleged injuries qualified as personal information.

¹⁴ OIPC [Investigation Report F-2012-002](#) at paragraph [59].

¹⁵ OIPC [Review Report 152-2023](#) at paragraph [62] defines "employment history" as the type of information normally found in a personnel file, including performance reviews and evaluations.

¹⁶ OIPC [Investigation Report 114-2017](#) at paragraphs [13] to [19].

Record #4

- Redaction 1 is the name of the individual involved in the motor vehicle accident, which we have said qualifies as their personal information and should continue to be withheld.

IV FINDINGS

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

[28] The RM properly applied section 28(1) of *LA FOIP* to withhold the redacted portions of the responsive records.

V RECOMMENDATION

[29] I recommend that the RM continue to withhold the redacted portions of the responsive record pursuant to section 28(1) of *LA FOIP*.

Dated at Regina, in the Province of Saskatchewan, this 6th day of October, 2026.

Grace Hession David
Saskatchewan Information and Privacy Commissioner