Office of the
Saskatchewan Information
and Privacy Commissioner

REVIEW REPORT 334-2025

Rural Municipality of Reford No. 379

October 29, 2026

Summary: The Applicant submitted an access to information request to the Rural Municipality of Reford No. 379 (RM) for records related to the purchase and installation of security equipment and internet services. The RM responded to the access request and provided the Applicant with responsive records. The RM withheld portions of the records pursuant to the exemptions in sections 18(1)(a) (trade secrets of a third party), 18(1)(b) (financial, commercial, scientific, technical or labour relations information of a third party, 18(1)(c) (information that could reasonably be expected to result in financial loss or gain to, prejudice the competitive position of or interfere with the contractual or other negotiations of a third party, 18(1)(d) (a statement of financial account relating to a third party with respect to the provision of routine services from a local authority), and 28(1) (personal information of a third party) of *The Local Authority Freedom of Information and Protection of Privacy Act* (*LA FOIP).*

The Applicant requested a review by the Office of the Saskatchewan Information and Privacy Commissioner (OIPC) with respect to the RM's application of exemptions to the record.

During the course of the review, the RM withdrew its reliance on the exemptions in section 18(1) of *LA FOIP* and also requested that the discretionary exemption in section 17(1)(b) (financial, commercial, scientific, technical or other information in which the local authority has proprietary interest or right of use and that has or is reasonably likely to have monetary value) be added to the scope of the review. The Commissioner granted this request.

Following the release of portions of the record, along with the index of records, the Applicant indicated they were no longer interested in the

information withheld pursuant to the exemption in section 17(1)(b) of *LA FOIP* as well as most of the information withheld under section 28(1) of *LA FOIP*. The remaining information was the name of an individual withheld on two separate pages of the record.

The Commissioner found that the RM did not properly apply section 28(1) of *LA FOIP* to the withheld name on page 1 and page 2 of the record.

The Commissioner recommended that the RM release the withheld name on pages 1 and 2 of the record to the Applicant within 30 days of the issuance of this Report.

I BACKGROUND

[1] On October 26, 2025, the Applicant paid the $20.00 application fee and, emailed an access to information request form to the Rural Municipality of Reford (RM) requesting the following:

> Pursuant to Section 6 of LA FOIP and Section 117(1)(a) of The Municipalities Act, I am requesting access to:
>
> 1) the statements of account, purchase orders, payment vouchers, cheques, or electronic fund-transfer records relating to Murlin Electronics, covering the purchase and installation of security equipment for the Cavell Shop.
>
> 2) the statements of account, and payment records relating to Starlink Internet Service, used to connect the Cavell Shop security system to the Foreman's phone and the RM office.
>
> 3) Any related council resolutions or contracts approving the purchase or payments, or cancellations for these services.
>
> Please provide these records for the period February 1, 2023 to October 27, 2025.

[2] On December 1, 2025, the RM issued a section 7 decision letter to the Applicant, granting access to 67 pages of responsive records. The RM indicated that it was withholding 26

pages in part pursuant to the exemptions in sections 18(1)(a), (b), (c), (d) and 28(1) of *The Local Authority Freedom of Information and Protection of Privacy Act* (*LA FOIP*).[1]

[3] On December 3, 2025, the Applicant requested a review of the RM's application of the exemptions by the Office of the Saskatchewan Information and Privacy Commissioner (OIPC).

[4] On June 25, 2026, the RM clarified that it had only applied the exemption in section 18(1)(d) of *LA FOIP* to the third party information in the record in addition to applying the exemption in section 28(1) of *LA FOIP* to third party personal information.

[5] On July 22, 2026, OIPC notified the Applicant, the RM and the third party that a review of the RM's application of the exemptions in sections 18(1)(d), and 28(1) of *LA FOIP* would commence. OIPC requested that the RM provide a copy of the records at issue, and an index of records along with all third party correspondence. All parties were invited to provide submissions on the matter.

[6] The Applicant provided a submission to OIPC on July 23, 2026.

[7] On August 6, 2026, the RM indicated that it was dropping its reliance on section 18(1)(d) of *LA FOIP* and releasing additional records to the Applicant.

[8] The RM provided OIPC with its index of records and a copy of the records on August 21, 2026. Following communication with this office on September 3, 2026, the RM requested that section 17(1)(b) of *LA FOIP* be included in the scope of the review because it had previously applied section 18(1)(d) of *LA FOIP* in error to some of the information in the record which it should have withheld under section 17(1)(b) of *LA FOIP*.

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

[9] The RM also consented to the sharing of its index with the Applicant which OIPC proceeded to do on September 3, 2026.

[10] Following communication with OIPC on September 4, 2026, the Applicant indicated that they were not interested in the information withheld under section 17(1)(b) of *LA FOIP* as well as some of the information withheld under section 28(1) of *LA FOIP*.[2] This reduced the scope of the review significantly.

[11] OIPC received a submission from the RM on September 21, 2026.

II RECORDS AT ISSUE

[12] The remaining record at issue is two pages in length. The RM withheld one name on page 1 at redaction 1 under the exemption in section 28(1) of *LA FOIP*. This same name was also withheld on page 2 at redaction 1. The rest was released.

III DISCUSSION OF THE ISSUES

1. Jurisdiction

[13] The RM qualifies as a "local authority" pursuant to section 2(1)(f)(i) of *LA FOIP*. *LA FOIP* is engaged and OIPC has jurisdiction under PART VI of *LA FOIP* to undertake this review.

2. The Application of Section 28(1) of *LA FOIP*

[14] The RM applied section 28(1) of *LA FOIP* to a payee on a cheque written by the RM on page 1 of the record at redaction 1. This same name was also withheld from an account statement on page 2 of the record at redaction 1.

[2] On September 4, 2026, the Applicant indicated they were no longer interested in the RM's financial account information, the withheld address of an individual, or the identifying number assigned to an individual within the record.

[15] 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.

[16] Section 28(1) of *LA FOIP* is a mandatory exemption. Before considering the application 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*. In order for information to be "personal information", it must: 1) be about an identifiable individual; and 2) be personal in nature.[3]

[17] The RM noted that the withheld information qualified as personal information under sections 23(1)(j) and (k)(i) of *LA FOIP*. The following sections are therefore relevant:

> **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:
>
> ...
> (j) information that describes an individual's finances, assets, liabilities, net worth, bank balance, financial history or activities or credit worthiness; or
>
> (k) the name of the individual where:
>
> (i) it appears with other personal information that relates to the individual; or

[18] The RM submitted that the name, in combination with the context it appeared in, qualified it as personal information. The RM specified:

> The names appearing on pages 1 and 2 do not appear in isolation. They appear in connection with payment and financial information concerning the individuals. Disclosure of the names would therefore connect identifiable

[3] OIPC Review Report 221-2025 at paragraph [32].

> individuals to specific financial transactions and reveal personal financial information about them…

[19] The Applicant indicated that they wished for this office to review whether those names qualified as personal information in the context in which they appeared, specifically, whether names of individuals acting in an employment, official or business capacity should be withheld.

[20] This office has established that a name alone does not qualify as personal information under section 23(1) of *LA FOIP* unless the release of the name itself reveals personal information about the individual, or the name appears with other information that constitutes personal information.[4]

[21] The RM redacted both the first and last name of the same individual on both pages 1 and 2. This individual's name appears on page 2 within the context of paying an invoice and on page 1 within the context of being reimbursed for expenses by the RM.

[22] An examination of the entire record showed that this individual was clearly an employee of the RM and that the transactions were relevant to assigned professional duties, specifically, the paying out by the employee and subsequent RM reimbursement for work-related expenses.

[23] On October 27, 2026, the RM provided additional information including a breakdown of the work-related expenses paid by this employee which necessitated the reimbursement shown by the cheque on page 1 of the record. When combined with the invoice amount shown on page 2 of the record, all work-related expenses paid by this employee are accurately reflected in the amount shown on the cheque.

[4] OIPC Review Report 060-2025 at paragraph [74].

[24] Given this context, it is evident that the financial transactions involving the employee are not personal in nature.[5] Further, the RM withheld other data elements present on page 1 and 2 of the record that may have constituted personal information when viewed in conjunction with the employee's name; however, those data elements are not at issue in this review.

[25] In this case the redacted name is not found in conjunction with any other personal information related to this individual. The presence of the name within the record only reveals that an employee acted in a professional capacity and received reimbursement for expenditures incurred in the course of that duty.[6] The name does not qualify as personal information and section 28(1) of *LA FOIP* does not apply to this information.

IV FINDINGS

[26] OIPC has jurisdiction and has undertaken a review of this matter pursuant to PART VI of *LA FOIP*.

[27] The RM did not properly apply section 28(1) of *LA FOIP* to the withheld name on page 1 and page 2 of the record.

V RECOMMENDATION

[28] I recommend, within 30 days of the issuance of this Report, that the RM release the withheld name on pages 1 and 2 of the record to the Applicant.

[5] Office of the Information and Privacy Commissioner of Ontario Order PO-2905 at page 4: "It has been established in a number of previous orders that information provided by, or relating to, an individual in a professional capacity or in the execution of employment responsibilities, including charges incurred in the course of employment, is not "personal information" for the purposes of the Act."

[6] OIPC Review Report 321-2025 at paragraph [78].

Dated at Regina, in the Province of Saskatchewan, this 29th day of October, 2026.

Grace Hession David
Saskatchewan Information and Privacy Commissioner