Order F10-22

ABBOTSFORD POLICE BOARD; DELTA POLICE BOARD; NEW WESTMINSTER POLICE BOARD; PORT MOODY POLICE BOARD; SAANICH POLICE BOARD; VANCOUVER POLICE BOARD; VICTORIA POLICE BOARD; WEST VANCOUVER POLICE BOARD

Jay Fedorak, Adjudicator

June 16, 2010

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Summary: The applicant requested the name, position and salary information for all officers and civilian personnel from eight municipal police forces who made more than $75,000 during the most recent fiscal year. The police responded by providing a spreadsheet with the positions and salary information for all staff but withholding the names of officers below a certain rank and of all civilian staff under s. 15(1)(f), on the grounds that disclosure could endanger the life or safety of those individuals. The police were authorized by s. 15(1)(f) to refuse to disclose some but not all of the names.

Statutes Considered: *Freedom of Information and Protection of Privacy Act*, s. 15(1)(f).

Authorities Considered: **B.C.:** Order 03-08, [2003] B.C.I.P.C.D. No. 8; Order No. 60-1995, [1995] B.C.I.P.C.D. No. 33; Order 01-01, [2001] B.C.I.P.C.D. No. 1; Order No. 18-1994, [1994] B.C.I.P.C.D. No. 21. **Ont.:** Order M-913, [1997] O.I.P.C. No.77; Order M-912, [1997] O.I.P.C. No.76; Order M-465 [1995] O.I.P.C. No.69

1.0 INTRODUCTION

[1] The Vancouver Sun ("the applicant") requested, in electronic database format, the name, position and salary information for officers and civilian personnel earning more than $75,000 annually from eight municipal police forces for the most recent fiscal year. These requests were part of a series of requests to police to obtain the data to be stored in an on-line database of public sector

salaries for employees earning in excess of $75,000 per year. The applicant makes this database available to the public on its website with a search engine that permits users to conduct searches by name, agency, sector and salary level. The police responded by providing spreadsheets with the position and salary information for all staff but withholding the names of officers below a certain rank and of all civilian staff, under ss. 15(1)(f) of the *Freedom of Information and Protection of Privacy Act* ("FIPPA"), on the grounds that disclosure could endanger the life or safety of those individuals. The applicant was dissatisfied with the responses and requested a review by the Office of the Information and Privacy Commissioner ("OIPC").

[2] During mediation, the applicant agreed to exclude the names of undercover police officers from the scope of the review. Mediation was not successful in resolving the issue further, and a joint inquiry on the eight reviews was held under Part 5 of FIPPA. The OIPC invited the BC Police Association ("BCPA"), the BC Civil Liberties Association ("BCCLA") and the Freedom of Information and Privacy Association ("FIPA") to participate in the inquiry as appropriate persons. The BCPA made initial and reply submissions. FIPA made an initial submission but not a reply submission. The BCCLA did not make a submission. While the eight police forces did not release identical information to the applicant, they agreed that the same legal advisor would represent them and provide a uniform submission to the inquiry.

2.0 ISSUE

[3] The issue before me is whether the police are authorized to refuse access to the requested records under ss. 15(1)(f) of FIPPA. Under s. 57(1) of FIPPA, the police have the burden respecting s. 15.

3.0 DISCUSSION

[4] **3.1 Records in Dispute**—The severed records consist of electronic versions of spreadsheets containing fields for the name, position and salary of staff at the eight police forces.[1] Most also contain a field for the expenses of each individual. Some of them contain a field for the departmental section in which the individual works. The Victoria Police, the Saanich Police, the New Westminster Police and the Port Moody Police disclosed the names of individuals with the rank of Chief Constable, Deputy Chief Constable and Inspector. The Port Moody Police also disclosed the name of an officer manager. The Vancouver Police disclosed the names of individuals with the rank of Chief Constable, Deputy Chief Constable and Superintendent. The West Vancouver Police disclosed the names of individuals with the rank of Inspector, but it did not disclose any information at all about its Chief Constable, because, it states, there was turnover of personnel and no single employee in the position

[1] The applicant received electronic versions, but the police departments supplied paper copies for the purpose of this inquiry.

had earned $75,000 during the relevant fiscal year. Prior to the inquiry, the Delta Police and the Abbotsford Police did not disclose any names at all. I wrote to the solicitor representing the police and pointed out this inconsistency in the responses of their clients. The solicitor responded by indicating that the Delta Police and Abbotsford Police would disclose the names in a manner consistent with the other police, which they did.

[5] **3.2 Preliminary Issue**—The BCPA attempted to raise new exceptions to be considered in the inquiry: ss. 15(1)(a) and 19(1). The police did not seek to apply these exceptions in their initial decisions, and they did not arise as issues during mediation. Moreover, past orders and decisions of this office show that it is up to public bodies to apply discretionary exceptions and a public body cannot be compelled to exercise its discretion in a particular way. The OIPC therefore declined to permit the BCPA to raise these new exceptions.

[6] **3.3 Harm to a law enforcement matter**—The relevant provision of s. 15 in this case is this:

> **Disclosure harmful to law enforcement**
>
> **15** (1) The head of a public body may refuse to disclose information to an applicant if the disclosure could reasonably be expected to …
>
> (f) endanger the life or physical safety of a law enforcement officer or any other person, ...

[7] No previous orders in British Columbia have dealt with the application of s. 15(1)(f) to the names of law enforcement officers. Commissioner Loukidelis examined the use of this section with respect to information about staff at the University of Victoria in Order 03-08.[2] In that order, he stated the following about the application of this section:

> [20] The section imposes a reasonable expectation of harm test. I said the following about the standard of proof contemplated by the s. 17(1) reasonable expectation of harm test in Order 02-50, [2002] B.C.I.P.C.D. No. 51, at para. 137:
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> > [137] Taking all of this into account, I have assessed the Ministry's claim under s. 17(1) by considering whether there is a confident, objective basis for concluding that disclosure of the disputed information could reasonably be expected to harm British Columbia's financial or economic interests. General, speculative or subjective evidence is not adequate to establish that disclosure could reasonably be expected to result in harm under s. 17(1). That exception must be applied on the basis of real grounds that are connected to the specific case. This means establishing a clear and direct connection between the

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[2] [2003] B.C.I.P.C.D. No. 8

> > disclosure of withheld information and the harm alleged. The evidence must be detailed and convincing enough to establish specific circumstances for the contemplated harm to be reasonably expected to result from disclosure of the information. …
>
> [21] I have applied these comments in approaching UVic's s. 15(1)(f) case. Without altering the standard of proof, I have kept in mind that vital third-party interests are engaged by s. 15(1)(f), making it important to approach the evidence with care and deliberation.[3]

[8] I have taken the same approach with respect to this inquiry.

[9] The applicant, the police and FIPA included in their submissions considerable argument about the extent to which the information in dispute should be disclosed to meet the accountability objectives of FIPPA. I have considered these arguments but do not describe them at length here. The desirability of accountability is one of the factors that public bodies should consider when exercising their discretion to apply discretionary exceptions. Nevertheless, the fact that one of the purposes of FIPPA is to promote accountability does not override the authority of public bodies to withhold information where disclosure could reasonably be expected to pose a danger to life and physical safety. Nor have I assessed any arguments about whether disclosure is not an unreasonable invasion of the personal privacy of the officers in accordance with s. 22(4)(e), because none of the police has withheld any information under s. 22.

[10] The police have taken two positions on the application of s. 15(1)(f). Their initial position is that it applies to the names of all police officers. Their fallback position is that it applies to officers who are working, or might work, undercover. Their primary concern is that, having obtained the name of a police officer, a recipient would find it easy to locate where he or she lived, using land title and assessment roll databases.[4]

[11] The applicant counters that argument by pointing to the fact that police publicize the names of some of their officers. The applicant asserts that this undermines the argument that disclosure of any of the names would put officers at risk.[5]

[12] The police and the BCPA reject this counter argument, citing an Ontario case in support. The finding in Ontario Order M-913[6] upheld the decision of the Metropolitan Toronto Police to withhold the names of all of its officers in response to a request for a list of those names. The Inquiry Officer found that disclosure of

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[3] Order 03-08, paras. 20-21.
[4] Public bodies' initial submission, para. 19.
[5] Applicant's initial submission, paras. 21-22.
[6] Ontario Order M-913, [1997] O.I.P.C. No. 77

the names of the officers "could reasonably be expected to make their work more dangerous" and in some cases put family members and others at risk.[7] She also found that the fact that the police exercised discretion to publicize the identity of particular officers in some cases did not mean that they should lose the right to decide whether to withhold those names in circumstances that they considered appropriate.[8] The findings in that case were identical to those in Ontario Order M-465.[9]

[13] The applicant submits that the findings in the Ontario cases are not applicable in the present case because:

> … they were made in a different technological time, when the public's access to the Internet was not nearly as far-reaching as it is today. Today, an officer's name is easily findable online as soon as he/she is quoted in a department press release, or congratulated for receiving an award, or interviewed for a media story. Not only are police department websites searchable, but so too are the archives of news outlets and many other organizations that either support the police or are critical of them. The references to those names remain online indefinitely, as opposed to in the mid-1990s when press releases were discarded and newspaper archives were not available to the public for searches.[10]

[14] The applicant's point here is not clear. It has not in any event explained how the greater proliferation of information about identifiable police officers has reduced the threat to their health and safety, if this is what it believes.

Risks to all officers

[15] The police identify a specific risk that, in their view, disclosure of the names of police officers would pose for all police officers and members of the community. They argue that disclosure of the names of officers would result in the same harm that Commissioner Flaherty found could occur with respect to disclosing the names of individuals with restricted weapons licences in Order 60-1995.[11] Commissioner Flaherty agreed that

> … identifying owners of handguns and the guns held by them could increase the risk of their theft, thus possibly facilitating the commission of an offence, and thus possibly endangering the physical safety of law enforcement personnel and other persons.[12]

[7] Public bodies' initial submission, para. 30; Ontario Order M-912, [1997] O.I.P.C. No. 76, p. 5.
[8] Public bodies' initial submission, paras. 52-56; Ontario Order M-912, p. 5; BCPA reply submission, para 19.
[9] [1995] O.I.P.C. No. 69.
[10] Applicant's reply submission, para. 11.
[11] [1995] B.C.I.P.C.D. No. 33
[12] Public bodies' initial submission, para. 16; Order 60-1995.

[16] The concern about the theft of these weapons was that, once they were in the hands of potential criminals, it would result in greater risk of violent crimes occurring and of police themselves being at risk when confronting these criminals. In that case, the Commissioner confirmed the police's application of s. 15(1) of FIPPA to the list.

[17] The police argue that because police officers sometimes have legitimate reasons for taking their firearms to their homes, it is reasonable for thieves to conclude that the homes of police officers are more likely to have guns within them than other homes among the general public.[13] Therefore, they submit, some thieves seeking firearms might target the homes of police officers.

[18] The applicant denies that there is any similarity between the facts of the present case and the request for restricted weapons certificates.[14] It also suggests that it is unrealistic to think a criminal would target the home of a police officer, merely for the purpose of obtaining a weapon. Given the unusual working schedules of officers, it submits, it would be difficult to determine when the weapon would be in the home.[15]

Undercover officers

[19] The police's fallback position is that disclosing the names of officers who work undercover could threaten their lives and physical safety. There appears to be consensus among the parties on this point. The applicant is willing to exclude the names of these officers from the scope of the request in order to avoid this threat of harm, though it does not state explicitly that it accepts the arguments of the police. The opinions between the parties diverge, however, over whether this would resolve the potential threat. The police and the BCPA argue that it is standard practice for officers to move back and forth between undercover assignments and regular uniform assignments. While severing the names of officers currently undercover would protect those officers, they argue that it would leave vulnerable those officers currently in uniform that take undercover assignments in future.[16]

[20] The police's concern is that they would have to disclose to other applicants the same information they disclose to this applicant. A knowledgeable applicant could make several requests each year. By comparing the names, the police argue, such applicants could establish a pattern of which officers were going in and out of covert operations. This would enable applicants to focus on identifying those officers who have been active or who have recently gone undercover.[17]

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[13] Public bodies' initial submission, para. 22.
[14] Applicant's reply submission, para. 6.
[15] Applicant's reply submission, para. 10.
[16] Public bodies' initial submission, paras. 33-34; BCPA reply submission, para 30.
[17] Public bodies' initial submission, para. 44.

[21] The applicant denies that it would be possible to identify undercover officers by this method. It submits that there are many different reasons, such as retirement or transfer to another police force, why an officer might appear on a list one year but not on another.[18]

[22] As noted above, the police submit that, having obtained the name of a police officer, it would be easy to locate where he or she lived, using land title and assessment roll databases. They add:

> With some concerted effort, a person wishing to do so could compile an intelligence brief on individual officers and their families by observing the comings and goings at those homes and even developing a photo portfolio. Such materials, of course, would be a highly valuable and marketable commodity among criminals and criminal organizations. They would serve as important tools for such criminals to thwart law enforcement attempts to infiltrate their organizations and to identify and harm undercover officers.[19]

[23] The police believe that this information would be valuable for criminals to obtain for these reasons. They provide an anecdotal example:

> According to the experience of one Deputy Chief, the identity and personal information of investigative officers is highly valued by members of criminal gangs and they are willing to go to lengths to secure it. The Applicant is likely well aware of the interest of criminal gangs in personal information of officers – and the fear that the prospect of criminals having such information creates among the law enforcement community, having reported on this issue himself.[20]

[24] The police submit that covert operations require officers to work with

> … the most pernicious areas of criminal activity and against some of the most dangerous individuals in society, including apprehending armed offenders, making gang arrests, serving high-risk warrants, hostage rescues, extraction of barricaded suspects, witness protection, and investigating the most serious offences including murder, multi-kilo trafficking in cocaine and methamphetamines and possession and use of dangerous weapons.[21]

[25] According to the police, once criminals are able to identify undercover officers, it is reasonable to expect that the safety of those officers will be at risk.[22]

The police draw an analogy between the threats to physical safety of undercover officers and the threat to the safety of medical professionals who provide abortion

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[18] Applicant's reply submission, para. 14.
[19] Public bodies' initial submission, para. 42.
[20] Public bodies' initial submission, para. 43
[21] Public bodies' initial submission, para. 46.
[22] Public bodies' initial submission, para. 48.

services. They refer to Order 01-01,[23] in which Commissioner Loukidelis found that the disclosure of even statistical information could help to identify health practitioners. He accepted that those practitioners had legitimate concerns about their own safety and that of their families. The police submit that the danger to police officers is even more serious as "police officers in British Columbia suffer more deaths and physical harms from criminals than abortion service providers do from anti-abortion activists or extremists".[24]

[26] The applicant denies that Order 01-01 is a comparable case. It submits that, in the case of physicians providing abortion services, the public body provided arguments that satisfied the harms test in s. 15(1)(f). The applicant states that, in the present case, the police have not.[25]

Analysis

[27] The applicant seeks information that would be readily available in the case of most public bodies: information about the names, positions and remuneration of employees of public bodies. The police have implicitly recognized this by not applying s. 22 of FIPPA to the records. The applicant has made the same request to a wide breadth of public bodies in British Columbia and received names and salary information from all except the police at issue in this inquiry. However, the circumstances are reminiscent of the case before Commissioner Flaherty in Order 18-1994. [26] He stated:

> Under normal circumstances, I would be sympathetic to requests to disclose the names of public servants involved in the work of public bodies, since they are paid directly from the public purse. I conclude, however, that the circumstances of the present case are not normal ... While in the case of the Ministry's employees, the arguments presented to me were grounded more on the employees' apprehension for their safety rather than a history of actual harassment, I accept that these employees genuinely fear for their safety, because of what has happened to other people.

[28] Because he accepted that the threats against these individuals were serious, he stated "I prefer to act prudently in such matters."

[29] The applicant believes that there is no legitimate need to keep confidential the names of police officers, other than those currently working under cover. The applicant sees no reason for anyone to randomly target a particular officer solely because he or she is a police officer.[27] In cases where someone truly wanted to harm a police officer, "it would invariably be a particular officer such as

[23] [2001] B.C.I.P.C.D. No. 1.
[24] Public bodies' initial submission, para. 50; Order 01-01.
[25] Applicant's initial submission, para. 23.
[26] [1994] B.C.I.P.C.D. No. 21.
[27] Applicant's reply submission, para. 8.

the person who arrested them or questioned them at a crime scene or testified in court" and they would already know the names of such officers.[28]

[30] With respect to officers working undercover, the police have supported their arguments with affidavits of officers with considerable experience working undercover. While they have not identified any particular officers who have been killed or injured specifically because their identities were discovered while working undercover, they have provided their respective professional opinions based on experience.

[31] Despite agreeing to forgo the names of undercover police officers, the applicant argued that the claims that disclosure of the names of undercover officers could threaten their physical safety were merely speculative. However, I accept that, in the words of Commissioner Loukidelis, there is a confident and objective basis to conclude that disclosure of the information could reasonably be expected to threaten to the physical safety undercover officers and there is a clear and direct connection between disclosure and risk of harm. I am satisfied by the evidence that the police and the BCPA have provided, including a small amount of information the BCPA provided *in camera*, that there are individuals who seek to know the identities of undercover officers and would do them harm. An affidavit from an officer of the Delta Police provides an example of a situation where criminals went to considerable lengths to obtain identifiable information about police officers. He states:

> I was seconded to Coordinated Law Enforcement Unit (CLEU) where I was one of two File Coordinators for a project involving outlaw motorcycle gangs. This project was terminated after nine months as the investigation was compromised by a civilian employee of CLEU. The employee had been recruited by the motorcycle gang and was supplied with cocaine in exchange for their services. The employee was compelled to provide personal information and photographs of investigative team officers in order to enable the gang to compromise investigator's abilities to covertly conduct surveillance as well as acquire intelligence, evidence and information necessary for building a case for prosecution. It was clear to me that the identity and personal information of the investigative officers was highly valued by the gang members by virtue of the extent of their efforts to obtain said information.[29]

[32] Of course, the issue here is not just with respect to officers who are currently working undercover, but also for those who might work undercover in future. The police have demonstrated with affidavit evidence that there is a reasonable prospect that most officers could be put on an undercover assignment at some point. Some not currently working undercover have done so in the past and might again in the future. Some work uniform and undercover assignments simultaneously.

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[28] Applicant's reply submission, para. 7.
[29] Public bodies' initial submission, Affidavit of R. D. para. 3.

[33] The question then becomes whether disclosure of the remaining officers' names now could put those officers at risk in the future. The applicant denies that this poses any risk. In the event of future requests, it states the police can withhold the names of the officers working undercover at that time. The police are right, however, when they point out that whatever information is disclosed in response to this request will have to be disclosed to any other possible applicants at any time. The risk has to be assessed from the perspective of individuals who might be intent on identifying undercover police officers by making regular requests for the same information from all of the police forces and collating the lists. I accept that it would not be difficult to derive the identities of officers who are or have been likely working undercover in this way. I also accept that some individuals would go to some lengths to identify undercover officers for purposes that would threaten the physical safety of those officers.

[34] The applicant is correct to point out that absence from the list would not always be the result of officer working undercover, because some officers quit, retire or transfer to another police force. Nevertheless, by analyzing the lists from all of the police over several years, individuals could establish patterns that could, in most cases, indicate fairly accurately the officers working undercover. These individuals could verify such conclusions by putting those officers under surveillance.

[35] Given the nature of the risks these individuals could face, I consider it appropriate to treat this information with caution and err on the side of protecting the safety of individual officers who are working undercover now or who might work undercover in future. I find that disclosure of the names of officers who, it is reasonable to conclude, would be eligible to work on undercover assignments or who are currently doing so, would threaten their health or safety. Section 15(1)(f) therefore applies to these names.

[36] This is consistent with the findings in Ontario case I reference in para. 12 above, which also determined that the disclosure of the names of police officers who might work on undercover assignments could threaten their health or safety. The applicant has failed to persuade me that these decisions are out-dated on the grounds that technological change has made it easier to identify individual officers through publication that is more available and remains accessible for a longer period. It is not clear how the greater proliferation of information about identifiable police officers has reduced the threat to their health and safety. The applicant merely asserts this without supporting it with argument or evidence.

[37] The police have met their burden of proof with respect to the threat of harm to officers who work undercover now or who are reasonably expected to work undercover in future. However, for the reasons stated below, they do not, persuade me that there is a real threat of harm to officers who do not work undercover and are not likely ever to.

[38] The police's initial position was that the disclosure of the names of any officers would threaten their lives and physical safety. I find the police's argument on this point to be speculative and unsupported by the evidence. The fact that there are two cases in Ontario where Inquiry Officers decided that the police could withhold the names of all officers and civilian staff is not, in itself, determinative. I have not seen the evidence or submissions that were before the Inquiry Officers, and they did not provide very detailed reasons. There may well be circumstances in the present case that distinguish it, at least in part, from the Ontario cases.

[39] The attempt of the police to draw a parallel between owners of restricted firearms and all police officers does not persuade me. I accept Commissioner Flaherty's finding that identifying the names and addresses of individuals possessing rare and extraordinarily dangerous weapons would provide an opportunity for thieves interested in particular restricted firearms. In this case, the police say that weapons are only in the officers' homes when they are working on twenty-four hour surveillance or scheduled to attend an early morning training session.[30] They have provided insufficient evidence, however, to suggest that thieves are inclined to burgle the home of a police officer on the off chance that the officer might have brought their firearm home on a particular day.

[40] The police have provided some examples that demonstrate that there are officers who are highly unlikely ever to work undercover. These include officers working in media relations or community liaison who have already developed a public profile. The Delta Police, for one, have a fulltime media relations officer who publicly represents the force.[31] The practice is that officers with a public profile will not receive such assignments. The Victoria Police depose that their practice with respect to publicly disclosing the identities of officers:

> … is limited to that which is administratively or statutorily required, with some exceptions related to duties associated to media relations and community outreach initiatives. Generally, officers who are placed in positions where they are repeatedly publicly identified or where they are readily recognizable due to media appearances would not be considered for subsequent covert duties. ... When images of members of the Victoria Police Department are used in public documents such as our Strategic Plan, we are careful not to utilize officers who are currently working in covert duties or those officers who could be returned to covert duties at very short notice as a result of their undercover training. Nor do we utilize images of members of the Emergency Response Team that would in any way disclose that they are members of that Team.[32]

[30] Public bodies' initial submission, para. 21.
[31] Public bodies' initial submission, Affidavit of R. D. para. 10.
[32] Public bodies' initial submission, Affidavit of W. N. paras. 8-9.

[41] Therefore, s. 15(1)(f) does not apply to the names of any officers with a public profile.

[42] The police also acknowledge that their senior management are unlikely to work undercover and indeed, as I note above, the police have now disclosed the names, ranks and salaries of Chief Constables, Deputy Chief Constables, Superintendents and Inspectors. The one exception was the Vancouver Police, which is the only police force to incorporate a rank of Superintendent, below the rank of Deputy Chief and above the rank of Inspector. The Vancouver Police disclosed the names of Superintendents but did not disclose the names of Inspectors. The Vancouver Police explains this difference by pointing out that, as a result this additional layer of management above them, the roles of Inspectors in Vancouver are more operational than in other jurisdictions. This appears to suggest that Inspectors sometimes might also work undercover.

[43] The police have also failed to satisfy me that there is any threat to the health or safety of civilian personnel. The submissions of the police and the BCPA do not even mention the issue of civilian staff or any threats that disclosure of their names could pose. The Port Moody Police disclosed the name of an office manager, who I assume is a civilian employee. The Delta Police disclosed the names of four administrative staff, who I assume are civilians. The police have provided no evidence of a possible threat to the physical safety of civilian personnel. I therefore find that s. 15(1)(f) does not apply to their names.

[44] The finding of this inquiry is that the police must disclose the names of the following (provided that they earned in excess of $75,000 annually): (1) all civilian employees; and (2) any officers whom, owing to their rank, the public profile of their current position (such as include media relations, community liaison officers and any others who have a public profile) or any other reason, it is reasonable to expect will not likely work undercover.

4.0 CONCLUSION

[45] For reasons given above, under s. 58 of FIPPA, I make the following orders:

1. Subject to para. 2 below, I confirm that s. 15(1)(f) authorizes the police boards to withhold the names of all officers currently working undercover or who it is reasonable to expect will work undercover.

2. I require the police boards to give the applicant access to the names of civilian staff and any officers excluded from being considered for undercover assignments as per para. 1 above, who earned in excess of $75,000 per year.

3. I require the police boards to give the applicant access to this information within 30 days of the date of this order, as FIPPA defines "day", that is, on or before July 29, 2010 and, concurrently, to copy me on its cover letter to the applicant, together with a copy of the records.

June 16, 2010

ORIGINAL SIGNED BY

Jay Fedorak
Adjudicator

OIPC File No. F08-36458, F08-36460,
F08-36462, F08-36464, F08-36466,
F08-36468, F08-36470, F08-36472