



Order P24-05

Text IQ Labs Canada Inc.

Alexander Corley
Adjudicator

February 27, 2024

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Summary: An individual (applicant) requested their own personal information from a former employer (organization). In response, the organization provided some information to the applicant but withheld other information under several exceptions to disclosure in the *Personal Information Protection Act*. The adjudicator determined that the organization was authorized to withhold all the information it refused to disclose under s. 23(3)(a) (solicitor-client privilege). It was also required to refuse to disclose some information under ss. 23(4)(c) and (d) because disclosure would reveal personal information about another individual or would reveal the identity of an individual who provided personal information about the applicant. However, the adjudicator ordered the organization to disclose the rest of the applicant's personal information either because ss. 23(4)(c) and (d) did not apply or because they did apply but the documents could be further severed and the applicant's personal information disclosed under s. 23(5).

Statutes Considered: *Personal Information Protection Act*, [SBC 2003], c. 63, ss. 1, 23(3)(a), 23(4)(c), 23(4)(d), and 23(5).

INTRODUCTION

[1] An individual (applicant) requested their own personal information from their former employer, Text IQ Labs Canada Inc. (organization), under the *Personal Information Protection Act* (PIPA). In response, the organization disclosed numerous documents while withholding some information under ss. 22(3)(a), 22(3)(b), 23(4)(c), and 23(4)(d) of PIPA.

[2] The applicant requested that the Office of the Information and Privacy Commissioner (OIPC) review the organization's decision to withhold information. Mediation by the OIPC did not resolve the matter and the applicant requested that it proceed to an inquiry.

Preliminary Matters

Information withheld under s. 23(3)(b)

[3] The organization clearly submits that it is no longer relying on s. 23(3)(b) to withhold any information.¹ However, the final documents package provided for purposes of this inquiry (documents pack) is marked as still having some information withheld under s. 23(3)(b).² Given that the organization has not indicated any alternative basis for severing this information, I find that the organization must release it to the applicant.³

Matters outside the scope of this inquiry

[4] The applicant raises several issues that were not included in the Notice of Inquiry or Investigator's Fact Report. Moreover, the applicant already raised these issues during the submissions phase of this inquiry. After having considered them, the OIPC issued a preliminary decision declining the applicant's request to add those issues to this inquiry.⁴ The applicant does not explain why it is necessary to reconsider that decision and I decline to do so. Based on this, I will not consider the applicant's arguments concerning PIPA issues which the OIPC has previously determined to be outside the scope of this inquiry.⁵

Information allegedly severed without explanation

[5] The applicant argues that the organization has severed some information from the documents pack without explaining why.⁶

[6] Having reviewed the documents pack, I find that the markings the applicant is concerned with are not redactions but are relics related to how some information in the documents pack was originally formatted. Therefore, I will not further consider the applicant's submissions on this point.

¹ Organization's initial submission at paras. 13 and 14; organization's reply submission at para. 4.

² Documents pack at pp. 325 and 413.

³ I have considered whether the organization is required to withhold any of this information under s. 23(4) as that section contains mandatory disclosure exceptions. However, I find that the information in question clearly does not fall within the scope of s. 23(4).

⁴ OIPC correspondence to parties dated July 19 & 20, 2023 at pp. 1-2, declining to add PIPA ss. 28, 33, 34, 54, and 56(1)(d) or (e) as issues in this inquiry.

⁵ This includes the applicant's arguments related to legibility issues with some information in the documents pack (applicant's submission at paras. 3, 42-49, 52-53, and 55-58). I find that these are, at bottom, arguments that the organization has not fulfilled its duty to reasonably assist the applicant under s. 28 of PIPA, which is not properly in issue here: see OIPC's July 19 & 20, 2023 correspondence to parties at pp. 1-2.

⁶ Applicant's submission at paras. 31 and 35-41, regarding Documents pack at pp. 445 and 520.

Applicant's request to make an additional submission

[7] The applicant says there are two documents which were provided to them, with redactions, during OIPC mediation but which are not included in the documents pack.⁷ The applicant attaches copies of these documents to their submission as exhibits.⁸

[8] The applicant argues that the organization's failure to include one of these documents (Exhibit 6 document) in the documents pack compromised the applicant's ability to make fulsome submissions regarding that document. The applicant asks that they be allowed to make an additional submission after receiving the organization's explanation of the severing in that document.⁹ The applicant does not clearly request any remedy regarding the other document they allege was not included in the documents pack (Exhibit 5 document).

[9] In response, the organization says that the information in the Exhibit 5 document already appears in the documents pack.¹⁰ Based on my review of the documents pack, I find that all relevant information in the Exhibit 5 document is included in the documents pack.¹¹ Therefore, I am satisfied the applicant has already had an opportunity to respond to what the organization said about the Exhibit 5 document and no further submission about it is warranted.

[10] Regarding the Exhibit 6 document, the organization has withheld most information from it under ss. 23(3)(a) and an additional small amount under 23(4)(c).¹² The organization says that it relies on what it said about s. 23(3)(a) in its initial submission.¹³ The organization provided an un-redacted copy of the Exhibit 6 document for my review.¹⁴

[11] For the reasons that follow, I find that there is no basis for allowing the applicant to make an additional submission regarding the Exhibit 6 document. First, the organization's bases for refusing access to information in the Exhibit 6 document are not new ones. At the time the applicant made their submission in this inquiry, they already knew that ss. 23(3)(a) and 23(4)(c) were issues to be decided. Further, the applicant's own evidence is that at the time they drafted their submission they already had a copy of the Exhibit 6 document, marked to

⁷ Applicant's submission at paras. 23-24.

⁸ Applicant's submission at Exhibits 5 and 6.

⁹ Applicant's submission at para. 30.

¹⁰ Organization's reply submission at para. 14.

¹¹ See applicant's submission at Exhibit 5 and Documents pack at pp. 444-445 and 548-550.

¹² The copy of the Exhibit 6 document attached to the applicant's submission indicates that information has been severed from pp. 1-2 under s. 23(3)(a) and from pp. 3-5 under s. 23(4)(c).

¹³ Organization's reply submission at para. 17. The organization does not make any direct arguments regarding the information severed from the Exhibit 6 document under s. 23(4)(c).

¹⁴ Organization's reply submission at para. 16; organization's letter to OIPC dated August 8, 2023, with enclosure.

indicate the bases on which the organization had severed information from it. Moreover, I can see that the applicant has, in fact, made relevant submissions regarding information severed from the Exhibit 6 document.¹⁵

[12] In these circumstances, I am satisfied that the applicant had a fair opportunity to make a submission regarding the information the organization has severed from the Exhibit 6 document under ss. 23(3)(a) and 23(4)(c).

Allegation the inquiry has been “poisoned” against the applicant

[13] The organization’s submissions discuss the cessation of the applicant’s employment. The applicant submits that the inclusion of this information “poisons the atmosphere of this inquiry” against them and requests that I do something “to help put this issue in check within this inquiry.”¹⁶

[14] I find that information about the end of the applicant’s employment is not relevant to the PIPA issues to be decided in this inquiry and I will not consider it for that reason. I do not find that fairness requires me to do anything else regarding the organization’s decision to include that information in its submission.¹⁷

ISSUES

[15] The issues to be decided in this inquiry are,

1. Whether the organization is authorized to withhold the information in dispute under s. 23(3)(a) of PIPA; and,
2. Whether the organization is required to withhold the information in dispute under ss. 23(4)(c) or (d) of PIPA.

[16] Under s. 51 of PIPA, the organization bears the burden of proving that the applicant has no right to access the information in dispute.

DISCUSSION

Background

[17] The applicant is a former employee of the organization. After the end of their employment, the applicant requested their personal information from the organization.¹⁸ The organization did not initially provide any responsive documents and the applicant submitted a second access request for the same

¹⁵ Applicant’s submission at paras. 25-27.

¹⁶ Applicant’s submission at para. 65.

¹⁷ Moreover, the OIPC does not police what information parties may include in their submissions.

¹⁸ Organization’s initial submission at para. 8.

information.¹⁹ The organization's response to the second access request is at issue in this inquiry.

Information in dispute

[18] The documents pack, the Exhibit 5 document, and the Exhibit 6 document collectively contain 802 pages (documents). The organization has severed information in dispute from 159 of those pages.²⁰ I find that the severed information is:

- Individuals' names, usernames, e-mail addresses, and telephone numbers;²¹
- Information regarding individuals' educational and employment histories;²²
- Information describing work-related actions taken by individuals;²³
- Information related to individuals' domestic lives;²⁴
- Information received from, or to be provided to, lawyers;²⁵ and
- Information contained in communications between the organization and lawyers.²⁶

Is the information in dispute the applicant's personal information?

[19] Section 23(1)(a) of PIPA gives an individual the right to access their own personal information that is under the control of an organization, subject to the exceptions set out in ss. 23(2) through (5). Therefore, the first question to be answered is whether the information in dispute is the applicant's "personal information" as defined in PIPA.

¹⁹ Organization's initial submission at para. 9.

²⁰ Documents pack at pp. 9, 17-18, 23-24, 55-59, 114-115, 120-121, 253-257, 260, 263-268, 272, 276-279, 283, 423, 426, 428, 444-447, 450-454, 472, 474, 477-480, 483-486, 520-524, 531, 543-546, 548-553, 561-563, 566, 569, 579, 581, 584, 592, 600, 602, 604, 606, 608, 610-615, 620-621, 623-628, 632, 635-640, 644, 648-652, 655, 658-662, 666, 670-671, 674-675, 684-687, 690-693, 695-698, 700, 702-704, 732, 735, 737, 739-740, 742-749, and 752; Exhibit 5 document at pp. 1-2; Exhibit 6 document at pp. 1-5.

²¹ Documents pack at pp. 9, 17-18, 55-59, 114-115, 253-257, 260, 263-268, 272, 276-279, 283, 444-447, 450-454, 520, 523, 543-546, 548-553, 561-563, 566, 569, 579, 581, 584, 611, 620-621, 623-628, 632, 635-640, 644, 648-652, 655, 658-662, 666, 670-671, 674-675, 684-687, 690-693, 695-698, 700, 702-704, 747-749, and 752; Exhibit 5 document at pp. 1-2; Exhibit 6 document at pp. 3-5.

²² Documents pack at pp. 23-24, 120-121, 450, 543, 684, 691, 695-696, and 702.

²³ Documents pack at pp. 253, 265, 276, 620, 625, 628, 637, and 659.

²⁴ Documents pack at pp. 523-524, 569, 592, 602, 604, and 611-612.

²⁵ Documents pack at pp. 423, 426, 428, 472, 474, 477-480, 483-486, 521-522, 531, 600, 606, 608, 610, 613-615, 732, 735, 737, 739-740, and 742-746.

²⁶ Exhibit 6 document at pp. 1-2.

[20] Under s. 1 of PIPA, “personal information” means information about an identifiable individual and includes “employee personal information.” However, “personal information” does not include “contact information” or “work product information,” which are defined at s. 1 of PIPA as follows,

“contact information” means information to enable an individual at a place of business to be contacted and includes the name, position name or title, business telephone number, business address, business email or business fax number of the individual[; and],

“work product information” means information prepared or collected by an individual or group of individuals as a part of the individual’s or group’s responsibilities or activities related to the individual’s or group’s employment or business but does not include personal information about an individual who did not prepare or collect the personal information.

[21] Applying these definitions to the information in dispute, I find that much of it is the applicant’s personal information. This information refers to the applicant by name, is the identities of third parties who provided employment references or job fit evaluations for the applicant, or is information contained in:

- e-mails sent to or by the applicant concerning matters outside the applicant’s normal work responsibilities;
- transcripts of conversations which included the applicant;
- preparation documents for interviews with the applicant;
- e-mail conversations which, in context, clearly refer to the applicant; or,
- documents or e-mails given or sent to the applicant as part of their onboarding with the organization.

[22] In each of these cases, I find that this information is about the applicant and is not their contact information or work product information because it was not created or provided to allow the applicant to be contacted at a place of business and was not prepared or collected by the applicant in relation to their regular employment responsibilities. Therefore, it is the applicant’s personal information.

[23] However, I find that a small amount of the information in dispute is not the applicant’s personal information. Some of this information is contained in internal instant messages related to a support ticket the applicant submitted while working on a project for the organization.²⁷ I find that this information was prepared by the applicant as part of their responsibilities related to their employment. Therefore, it is the applicant’s “work product information,” not their personal information. There are also several emails that have been largely disclosed to the applicant apart from some severed information about individuals’

²⁷ Documents pack at pp. 520 and 584.

domestic lives.²⁸ I find that the information severed from these emails is not the applicant's personal information because it is not about the applicant. The applicant does not have a right to access the information referenced in this paragraph and I will not consider it further.

Section 23(3)(a) – solicitor-client privilege

[24] Section 23(3)(a) says that an organization is not required to disclose an applicant's personal information if the information is protected by solicitor-client privilege.

[25] In relation to s. 23(3)(a) of PIPA, solicitor-client privilege includes legal advice privilege and litigation privilege.²⁹ Only legal advice privilege is at issue in this inquiry.

[26] Legal advice privilege applies to communications that,

1. Are between solicitor and client;
2. Entail the seeking or giving of legal advice; and
3. Are intended by the parties to be confidential.³⁰

[27] Furthermore, it is not only the direct communication of advice between solicitor and client that may be privileged. The "continuum of communications" related to legal advice, that would reveal the substance of the advice, attracts the privilege.³¹ The "continuum" includes internal client communications regarding received legal advice and its implications.³²

[28] Under s. 23(3)(a), the organization has withheld parts of some e-mails in the documents pack as well as the full content of several e-mails in the Exhibit 6 document.³³

[29] The organization says this information is, in each case, contained in written communications between the organization and its external legal counsel,

²⁸ Documents pack at pp. 523-524, 569, 592, 602, 604 and 611-612.

²⁹ Order P20-01, 2020 BCIPC 6 at para. 14.

³⁰ *Solosky v. The Queen*, 1979 CanLII 9 (SCC) at p. 837.

³¹ *Bilfinger Berger (Canada) Inc. v. Greater Vancouver Water District*, 2013 BCSC 1893 [*Bilfinger*] at paras. 22-24. See also *British Columbia (Attorney General) v. Lee*, 2017 BCCA 219 [*Lee*] at paras. 32-33.

³² *Bilfinger*, *ibid* at para. 24

³³ Documents pack at pp. 423, 426, 428, 472, 474, 477-480, 483-486, 521-522, 531, 579, 600, 606, 608, 610, 613-615, 732, 735, 737, 739-740, and 742-746; Exhibit 6 document at pp. 1-2. Some of this information is not indicated as withheld under s. 23(3)(a) in the organization's submissions but is marked as such in the Documents pack. Some information on p. 531 is only indicated as withheld under s. 23(4)(c) in the Documents pack but is clearly indicated as withheld under s. 23(3)(a) at para. 20(b) of the organization's initial submission.

or in internal communications where a representative of the organization refers to legal advice received from external legal counsel and identifies external legal counsel as the source of the advice.³⁴ The organization further says that all the information it has withheld under s. 23(3)(a) was intended to be kept confidential.³⁵

[30] The applicant argues that the information withheld from the Exhibit 6 document is not privileged based on their belief that the Exhibit 6 document does not contain communications between a solicitor and their client.³⁶

Analysis

[31] Based on the organization's submissions and my review of the information in dispute, I accept that the organization was in a solicitor-client relationship with its external legal counsel when the communications set out in the documents occurred. I also accept, on the same basis, that the information the organization has withheld under s. 23(3)(a) was intended to be kept confidential. Further, contrary to the applicant's submission, I find that all the information severed from the Exhibit 6 document under s. 23(3)(a) is contained in communications between the organization and the organization's external legal counsel. Turning to whether the information the organization has withheld under s. 23(3)(a) relates to the seeking or giving of legal advice, I find as follows.

[32] Most of the information is contained in e-mails internal to the organization. I find that in each of these e-mails, representatives of the organization either disseminate information received from the organization's external legal counsel to others within the organization or discuss actions that the organization may take based on information received from the organization's external legal counsel.³⁷ I also find in each case that the information severed from these e-mails under s. 23(3)(a) relates directly to the substance of legal advice received by the organization from its external legal counsel.

[33] A small amount of additional information withheld under s. 23(3)(a) is contained in e-mail communications between the organization and its external legal counsel.³⁸ Having reviewed the parties' submissions and the other information the organization has withheld under s. 23(3)(a), I find that releasing these communications to the applicant would allow the applicant to draw accurate inferences regarding the substance of legal advice sought by the organization.

³⁴ Organization's initial submission at para. 20; organization's reply submission at para. 17.

³⁵ Organization's initial submission at para. 21; organization's reply submission at para. 17.

³⁶ Applicant's submission at paras. 26-27.

³⁷ Documents pack at pp. 423 (same information repeated at pp. 426, 428, 472, 474, 477-480, 483-486, 521-522, 600, 606, 608, 610, 613-615, 732, 735, 737, 739-740, and 742-746) and 531.

³⁸ Exhibit 6 document at pp. 1-2.

[34] Based on the above, I conclude that all the applicant's personal information which the organization has severed from the documents under s. 23(3)(a) falls within the continuum of communications between the organization and its legal counsel related to issues on which the organization sought legal advice and is therefore protected by solicitor-client privilege.

Section 23(4)(c) – personal information about another individual

[35] Most of the information the organization has refused to disclose has been withheld under s. 23(4)(c). Under s. 23(4)(c), an organization must refuse to disclose information if the disclosure would reveal the personal information of anyone other than the applicant. Applying this section does not involve deciding if disclosure would unreasonably invade an individual's personal privacy. If the information is the personal information of an individual other than the applicant, then the organization must withhold it.³⁹

[36] The organization submits that the information it has withheld under s. 23(4)(c) is the personal information of individuals other than the applicant. Specifically, the organization says that this information is:

- about individuals who provided information about the applicant;
- about the employment and educational backgrounds of some of the organization's officers; or,
- the phone numbers of some of the organization's representatives which were used for "personal contact as well as professional contact purposes."⁴⁰

[37] The organization submits that it was required to withhold all this information under s. 23(4)(c).⁴¹ The applicant does not clearly address the application of s. 23(4)(c) to the information in dispute.

Analysis

[38] The information the organization has withheld under s. 23(4)(c) includes the names, e-mail addresses, usernames, and other directly identifying details of individuals other than the applicant, such as their unique job titles or job status

³⁹ As pointed out in Order P06-02, 2006 CanLII 32980 (BC IPC) at para. 53, this is in contrast to s. 22(1) of the *Freedom of Information and Protection of Privacy Act*, RSBC 1996, c. 165, which requires a public body to refuse to disclose personal information if the disclosure would be an unreasonable invasion of a third party's personal privacy.

⁴⁰ Organization's initial submission at para. 28(a), (c), and (d). The information referenced in para. 28(b) is information which I found above is not the applicant's personal information.

⁴¹ Organization's initial submission at paras. 32-33.

information.⁴² It also includes information about named individuals' employment, occupational, or educational histories.⁴³

[39] I find that all of this is clearly information about identifiable individuals other than the applicant. I also find that it is not contact information because it is clear from the context in which it appears that it was not provided to allow anyone to be contacted at a place of business. Further, I find that it is not work product information because, in each case, it either was not compiled by the individuals it is about, or it was compiled outside of those individuals' normal work responsibilities. Based on all of this, I conclude that disclosing this information would reveal personal information of individuals other than the applicant and s. 23(4)(c) applies to it.

[40] The only information that I find would not reveal other individuals' personal information is the phone numbers provided to the applicant during the applicant's onboarding with the organization. The organization submits these phone numbers were used for both personal and professional purposes. However, in the context in which they appear, I find that these phone numbers were provided to allow the applicant to contact representatives of the organization in their professional, not their personal, capacities. Therefore, I find that these phone numbers are contact information, not personal information, so s. 23(4)(c) does not apply.⁴⁴

[41] Based on the above, I find that s. 23(4)(c) applies to the applicant's personal information which the organization has withheld under that section with the sole exception of the phone numbers.⁴⁵ The organization must not disclose the information to which s. 23(4)(c) applies.

Section 23(4)(d) – identity of an individual who provided personal information about another individual

[42] The organization has applied s. 23(4)(d) to a small amount of information. Section 23(4)(d) requires an organization to refuse to disclose information that would reveal the identity of an individual who has provided personal information about another individual if the individual who provided the personal information does not consent to disclosure of their identity.

⁴² Documents pack at pp. 253-257, 260, 263-268, 272, 276-279, 283, 444-447, 451-454, 523, 543-546, 548-553, 561-563, 566, 569, 579, 581, 611, 620-621, 623-628, 632, 635-640, 644, 648-652, 655, 658-662, 666, 670-671, 674-675, 684-687, 690-693, 695-698, 700, 702-704, 747-749, and 752; Exhibit 5 document at pp. 1-2; Exhibit 6 document at pp. 3-5.

⁴³ Documents pack at pp. 23-24 and 120-121.

⁴⁴ Documents pack at pp. 9, 17-18, and 114-115.

⁴⁵ I have highlighted the information to which s. 23(4)(c) does not apply in the copy of the documents provided to the organization alongside this order.

[43] The organization submits that some of the information in dispute reveals the identities of individuals who provided employment references or job fit evaluations for the applicant, and that it has not received consent from those individuals to disclose this information.⁴⁶ The applicant does not clearly address the application of s. 23(4)(d) to the information in dispute.

[44] I find that the already disclosed portions of the documents demonstrate that certain individuals provided personal information about the applicant, in the form of their opinions about the applicant, to the organization while the organization was considering whether to hire the applicant.⁴⁷

[45] The information the organization has withheld under s. 23(4)(d) is a combination of the individuals' names, their social media profile information, and how they came to know the applicant.⁴⁸ In each case, I find that releasing this information to the applicant would reveal those individuals' identities. In addition, I accept the organization's submission that it does not have consent from any of those individuals to reveal their identity to the applicant.

[46] Based on the above, I find that s. 23(4)(d) applies to all the applicant's personal information that the organization has withheld under that section.

Section 23(5) – severance

[47] Section 23(5) says that if an organization can remove the information referred to in ss. 23(3)(a), (b), or (c), or 23(4) from a document that contains an applicant's personal information, the organization must provide the applicant with access to their personal information after the information referred to in ss. 23(3)(a), (b), or (c), or 23(4) is removed.

[48] I have found above that ss. 23(3)(a), 23(4)(c), and 23(4)(d) apply to most of the information in dispute. Therefore, I will consider whether the documents can be further severed and additional information provided to the applicant without revealing the information that I have found the organization is authorized or required to withhold.

[49] Courts have cautioned against severing documents containing information that is subject to solicitor-client privilege, going so far as instructing that "severance should only be considered when it can be accomplished without any risk that privileged information will be revealed or capable of ascertainment."⁴⁹ In

⁴⁶ Organization's submission at paras. 29-33.

⁴⁷ See Order P18-01, 2018 BCIPC 6 at para. 15 where similar information was found to be the personal information of both an applicant and individuals who had acted as employment references for that applicant.

⁴⁸ Documents pack at pp. 55-59 and 450.

⁴⁹ *Lee, supra* note 31 at para. 40.

this case, I do not find that any of the information s. 23(3)(a) applies to can be provided to the applicant without a risk that privileged information will be revealed to them.

[50] Turning to information I found, under s. 23(4)(c), is the personal information of individuals other than the applicant, I find that a small amount of this information can be released to the applicant:

- the “[organization].com” portions of some e-mail addresses. I find that this information is not, on its own, about identifiable individuals;⁵⁰ and,
- some content in a statement made about an individual external to the organization.⁵¹ As long as the organization continues to withhold the identifying information about this individual, the other information in the statement is no longer the personal information of anyone but the applicant so it can be disclosed.⁵²

[51] Finally, considering information I found, under s. 23(4)(d), would reveal the identities of individuals who provided personal information about the applicant, I find that a small amount of this information only reveals that an individual had a certain kind of social media account at a given time.⁵³ As long as the organization continues to withhold identifying information about that individual, the information about their social media activity does not reveal the individual’s identity so it can be disclosed.

[52] Taking all of this together, I conclude that the organization must provide the applicant with a small amount of the applicant’s personal information under s. 23(5).⁵⁴

CONCLUSION

[53] For the reasons given above, I make the following order under s. 52 of PIPA:

1. I confirm the organization’s decision to refuse to disclose the information in dispute under s. 23(3)(a) of PIPA.

⁵⁰ Documents pack at pp. 446, 451, and 453.

⁵¹ Documents pack at p. 579.

⁵² Regarding the individual who made the statement, the organization has not withheld their identity and I find that the statement was made as part of that individual’s regular employment responsibilities and is therefore that individual’s work product information.

⁵³ Documents pack at p. 450.

⁵⁴ Documents pack at pp. 446, 450-451, 453, and 579. I have highlighted the information which the organization must release to the applicant under s. 23(5) in the copy of the documents provided to the organization alongside this order.

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2. Subject to item 3, below, I require the organization to refuse, in part, to disclose the information in dispute under ss. 23(4)(c) and (d) of PIPA.
 3. I require the organization to give the applicant access to the information in dispute that I have highlighted in yellow on pages 9, 17-18, 114-115, 325, 413, 446, 450-451, 453, and 579 in the copy of the documents provided to the organization alongside this order.
 4. The organization must copy the OIPC registrar of inquiries on its cover letter to the applicant, together with a copy of the pages set out at item 3, above.

[54] Under s. 53(1) of PIPA, the organization must comply with this order by April 11, 2023.

February 27, 2024

ORIGINAL SIGNED BY

Alexander Corley, Adjudicator

OIPC File No.: P21-87863