OFFICE OF THE
INFORMATION & PRIVACY
COMMISSIONER
— for —
British Columbia

Order 02-21

MINISTRY OF PUBLIC SAFETY AND SOLICITOR GENERAL

David Loukidelis, Information and Privacy Commissioner
May 16, 2002

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Summary: The applicant, who had complained to the Ministry, his employer, about his supervisor's conduct, sought access to interview notes and other records related to the Ministry's investigation of the complaint. The Ministry is required by s. 22 to withhold third-party personal information and the applicant's personal information, which is inextricably intertwined with third-party personal information. The Ministry must, however, create a summary of the withheld information under s. 22(5).

Key Words: personal privacy – unreasonable invasion – workplace investigation – opinions or views – submitted in confidence – personal privacy – employment history – fair determination of rights – unfair exposure to harm – inaccurate or unreliable personal information – unfair damage to reputation.

Statutes Considered: *Freedom of Information and Protection of Privacy Act*, s. 22(1), 22(2)(c), (e), (f) and (h), 22(3)(d), 22(5).

Authorities Considered: B.C.: Order No. 330-1999, [1999] B.C.I.P.C.D. No. 43; Order 01-07, [2001] B.C.I.P.C.D. No. 7; Order 01-19, [2001] B.C.I.P.C.D. No. 20; Order 01-53, [2001] B.C.I.P.C.D. No. 56.

1.0 INTRODUCTION

[1] This decision arises out of two requests that the applicant, an employee of the British Columbia Corrections Service, made to the Ministry of Public Safety and Solicitor General ("Ministry") in 1999 for records related to workplace issues. In the first request, he sought records related to a complaint of abuse of managerial authority that he had made against his supervisor. He asked for a copy of the report of the investigation

into his complaint, any correspondence the investigator sent or received in the course of the investigation, any evidence the investigator obtained and any notes or correspondence sent or received by the director of operations at the facility at which the applicant worked. His second request was for tapes, transcripts and notes of interviews that investigators conducted with several named employees between November 1998 and February 1999.

[2] The Ministry responded separately to the requests in July 1999, in the first case by providing some records and denying access to others under ss. 13, 17 and 22 of the *Freedom of Information and Protection of Privacy Act* ("Act") and, in the second case, by denying access to records under ss. 17 and 22. The applicant requested reviews of these two decisions in early August 1999. As a result of mediation by my Office, the applicant received more information and records in a series of four further disclosures at various points in 2000 and the first part of 2001. The Ministry also withdrew its reliance on ss. 15 and 17. In para. 1.10 of its initial submission in this inquiry, the Ministry told me that it had also dropped the application of s. 13, leaving only s. 22 in issue.

[3] In his submissions in the inquiry, the applicant complained that some of the Ministry's materials in the inquiry were filed on an *in camera* basis. I am satisfied that the material the Ministry delivered on that basis is properly received *in camera*.

2.0 ISSUE

[4] The issue before me in this inquiry is whether the Ministry was required to withhold personal information under s. 22. Section 57(2)(a) of the Act places the burden on the applicant to show that disclosure of third-party personal information will not unreasonably invade the privacy of a third party. Previous cases establish that the burden of showing that the applicant's own personal information cannot be disclosed to him is on the Ministry. See, for example, Order No. 330-1999, [1999] B.C.I.P.C.D. No. 43 at p. 3-4.

3.0 DISCUSSION

[5] **3.1 Outline of Section 22** – Section 22 requires a public body to withhold personal information where its disclosure would be an unreasonable invasion of a third party's personal privacy. The portions of s. 22 relevant to this case are as follows:

> **Disclosure harmful to personal privacy**
>
> 22(1) The head of a public body must refuse to disclose personal information to an applicant if the disclosure would be an unreasonable invasion of a third party's personal privacy.
>
> (2) In determining under subsection (1) or (3) whether a disclosure of personal information constitutes an unreasonable invasion of a third party's personal privacy, the head of a public body must consider all the relevant circumstances, including whether …

> (c) the personal information is relevant to a fair determination of the applicant's rights, …
>
> (e) the third party will be exposed unfairly to financial or other harm,
>
> (f) the personal information has been supplied in confidence, … .
>
> (3) A disclosure of personal information is presumed to be an unreasonable invasion of a third party's personal privacy if …
>
> (d) the personal information relates to employment, occupational or educational history, … .
>
> (4) A disclosure of personal information is not an unreasonable invasion of a third party's personal privacy if …
>
> (e) the information is about the third party's position, functions or remuneration as an officer, employee or member of a public body or as a member of a minister's staff, … .
>
> (5) On refusing, under this section, to disclose personal information supplied in confidence about an applicant, the head of the public body must give the applicant a summary of the information unless the summary cannot be prepared without disclosing the identity of a third party who supplied the personal information.

[6] I have discussed s. 22 in numerous orders. For the purposes of workplace investigations such as the one underlying this case, see the discussion in Order 01-07, [2001] B.C.I.P.C.D. No. 7, and Order 01-53, [2001] B.C.I.P.C.D. No. 56. I will apply the principles from those discussions in this case.

[7] **3.2 Records in Dispute** – The Ministry provided me with copies of the 85 pages of records in dispute in this case, with the severed and withheld portions printed in red ink. The records consist of several pages of handwritten notes of interviews with employees at the applicant's workplace, including the applicant. The Ministry has severed and partially disclosed some of them, while it has withheld others in full. The records can be described as follows: handwritten interview notes; what appears to be a typed version of those interview notes, which includes the applicant's allegations (disclosed); interviewees' responses (some withheld, some severed); and the investigator's discussion of each interviewee's response (generally disclosed); transcripts of interviews with some employees (both severed and withheld entirely – one of these interview transcripts apparently relates to a later investigation into the applicant's own conduct); what appears to be the report resulting from the first investigation (severed); an e-mail message (severed); a set of handwritten notes (withheld in full); and a letter (severed).

[8] **3.3 Nature of the Personal Information** – The Ministry argued that much of the withheld information is the personal information of the third party about whom the applicant had complained. It reminded me that I acknowledged at para. 27 of

Order 01-19, [2001] B.C.I.P.C.D. No. 20, that, where a witness provides information about what he or she did in relation to the performance of his or her employment duties, that information is the witness's personal information. Where a witness provides information about another employee's performance of his or her employment duties, that information is the other employee's personal information (para. 5.09, initial submission). I also found at paras. 24 and 26 of Order 01-19, however, that a witness's factual statements about daily events and practices at a worksite did not fall under s. 22(1) or s. 22(3), and that a witness's factual account of an accident did not constitute that witness's personal information.

[9] In any case, I have reviewed the records in dispute and agree that the withheld information is personal information of the third party, the applicant and others, in the sense that it concerns their interactions, and things they said and did, in the workplace as related to the allegations in the applicant's complaint. It therefore principally consists of s. 22(3)(d) information, as I discuss below. The Ministry has already disclosed any information that falls under s. 22(4)(e).

[10] I agree with the Ministry's argument, at para. 5.13 of its initial submission, that the Act allows a public body to withhold an applicant's own personal information if disclosure of that information would unreasonably invade a third party's privacy. The applicant says he is only interested in his own personal information and not that of third parties (see, for example, para. 36 of his initial submission). However, as with many of these cases, the difficulty is that the personal information of the applicant and the third parties is often inextricably intertwined. The question I have to decide here is whether disclosure of any of the withheld personal information – whether the applicant's or a third party's, or both – would result in an unreasonable invasion of a third party's personal privacy.

[11] The Ministry argues, generally, that the withheld information falls under s. 22(3)(d) of the Act. It says at para. 5.11 of its initial submission that, in this case, "the information at issue clearly relates to an investigation into whether a third party's conduct constituted a misuse of managerial authority" in the workplace and is therefore that person's personal, employment-history information. The third party could potentially have been disciplined, it says, had the complaint been found to be substantiated. The disclosure of this information to the applicant is therefore presumed, the Ministry argues, to be an unreasonable invasion of the third party's privacy (paras. 5.11 and 5.30, initial submission).

[12] The Ministry notes that I considered a similar case in Order 01-07, [2001] B.C.I.P.C.D. No. 7, in which I found that information "relating to an investigation into or assessment of, the employment conduct" of a supervisor was that person's personal information and that it fell under s. 22(3)(d). It acknowledges, however, that some of the information "relates, in some fashion, to the Applicant. That is because the information requested relates to an investigation into an incident involving the Applicant" (paras. 5.11-12, initial submission).

[13] In my view, Order 01-07 and Order 01-53 provide useful parallels to this case in a number of ways. Both dealt with requests for records flowing from investigations of the applicants' complaints of misuse of supervisory, or managerial, authority. In both cases, as well, the records contained the personal employment history of the applicant and third parties. As will be seen, the results here are similar to my findings in those two orders.

[14] The applicant is of a different view. He argues generally, in his initial submission and at paras. 32-33 of his reply submission, that the records relate to his employment history alone, because he was later disciplined. One of the interview transcripts shows that he was the subject of the investigation, he says. The Ministry explains this by saying that, among other things, the applicant had asked for records of interviews with specified employees. It says the interview record which relates to the applicant, as the subject of the investigation, is from the later investigation into the applicant's own workplace conduct. Regardless of which investigation the records relate to, however, some of the withheld information is the applicant's employment history, in that it recounts workplace events in which he was involved with third parties. Some of the withheld information is personal information of third parties.

[15] The Ministry also argues that any factual information in the records cannot be released, with evaluative personal information severed. This is because, it says, the information in dispute relates entirely to an investigation into the third party's employment conduct and necessarily contains evaluations of the third party's performance of his job (paras. 5.30-5.35, initial submission).

[16] Based on the submissions and a careful review of the records in dispute in this case, I find that s. 22(3)(d) applies to the withheld information. Disclosure of that personal information as it relates to third parties is therefore presumed to be an unreasonable invasion of their personal privacy.

[17] **3.4 Relevant Circumstances** – The Ministry says it considered relevant circumstances, as required by s. 22(2), in deciding to withhold information under s. 22. Of the four possibly relevant circumstances that it considered, it concluded that one did not apply and that three favoured withholding the disputed information. The applicant makes it clear that he views s. 22(2)(c) as overwhelmingly favouring disclosure. I will consider that circumstance first.

Fair determination of the applicant's rights

[18] Much of the applicant's initial submission focusses on what he perceives as his rights in the workplace, which he believes trigger the circumstance in s. 22(2)(c) in a way that favours disclosure. He evidently disagrees with the results of the first investigation into his complaint of misuse of authority – which found his complaint to be unsubstantiated – and the second investigation into his own conduct. He suggests that the withheld information does not support the findings of these investigations. He believes the withheld information from the first investigation was used to discipline him after the second investigation. He says he has a right to know the information that his employer relied on to make disciplinary decisions about him flowing from the investigations, in

order to clear his name. He argues that the public body has never shown that there is any basis to its assertions and that it should be prepared to reveal this information if it has acted properly (see, for example, paras. 12, 26, 36, initial submission).

[19] The applicant returns to this theme in his reply submission, arguing that he was entitled to more disclosure during the grievance he filed after being disciplined (paras. 11-12, 14, reply submission). Of course, the applicant's grievance is not at issue here. Moreover, the only records I have before me relate to the investigation of the applicant's complaint against his supervisor, not to the subsequent investigation into the applicant's own conduct that apparently arose out of the first investigation. The applicant does not explain how one might link information in the records from the first investigation to any discipline he may have received as a result of the second investigation. In any case, as I note below and as other orders have indicated, it is not open to me to consider general fairness concerns in a s. 22 analysis.

[20] In discussing the s. 22(2)(c) circumstance, the Ministry cites my discussion in Order 01-07 for assessing whether this factor applies. I reproduce the relevant paragraphs of that order here for convenience:

> [30] … The alleged deficiencies in the Ministry's investigations – about which I express no opinion – are not relevant. The reasons for this conclusion follow.
>
> [31] In Ontario Order P-651, [1994] O.I.P.C. No. 104, the equivalent of s. 22(2)(c) was held to apply only where *all* of the following circumstances exist:
>
> 1. The right in question must be a legal right drawn from the common law or a statute, as opposed to a non-legal right based only on moral or ethical grounds;
>
> 2. The right must be related to a proceeding which is either under way or is contemplated, not a proceeding that has already been completed;
>
> 3. The personal information sought by the applicant must have some bearing on, or significance for, determination of the right in question; and
>
> 4. The personal information must be necessary in order to prepare for the proceeding or to ensure a fair hearing.
>
> [32] I agree with this formulation. I also note that, in *Greater Vancouver Mental Health Service Society* v. *British Columbia (Information and Privacy Commissioner)*, [1999] B.C.J. No. 198 (S.C.), at paras. 85-89, Lynn Smith J. concluded that a complainant's "fairness" concerns, related to the conduct of a complaint investigation, did not activate s. 22(2)(c).
>
> [33] The Ministry's investigations apparently were contemplated by the collective agreement between the BCGEU and the Province. It is clear – for reasons I cannot discuss here – that the disputed information is not

> relevant to a fair determination of the applicant's legal rights. There is no live legal issue surrounding the investigations or their outcomes that affects the applicant's (or anyone else's) employment. Nothing said during the investigations is relevant to a determination of any of the applicant's legal "rights", related to her employment or otherwise. If the applicant had concerns about the fairness of the investigations, she should (and likely could) have done something about those concerns in the context of the investigations themselves. After-the-fact access to third party personal information under the Act is irrelevant to the fairness of those now long-closed investigations.
>
> [34] The situation may differ, of course, where an applicant seeks information that is relevant to, and necessary for, an existing or pending arbitration or other legal proceeding in which that applicant's legal rights are being determined. An example is where an employer has refused to disclose information from an investigation that is needed by the applicant to defend herself in legal proceedings arising from, or related to, the investigation.
>
> [35] Section 22(2)(c) is not a relevant circumstance in this case.

[21] The Ministry argues that there is no live issue to trigger this factor. It says the applicant's grievance about discipline imposed on him as a result of the later investigation into his workplace conduct has been settled – a fact the applicant acknowledges – and there is no other legal right of the applicant's at issue. It argues that any concerns the applicant has about the fairness of the investigation, or the consequences of his complaint, do not activate s. 22(2)(c) (paras. 5.25-5.28, initial submissions; paras. 6-10, reply submission).

[22] I agree with the Ministry that s. 22(2)(c) is not relevant here. The grievance process has ended and the matter rests. In any case, despite the applicant's argument that he was disciplined as a result of complaining about his supervisor, there is no persuasive indication in the material before me that the information related to the investigation of the applicant's complaint against his supervisor is relevant to any discipline imposed on the applicant after the second investigation. It may not be surprising that the applicant questions the Ministry's findings – and the fairness of the first investigation and its findings – when he has almost no idea of what his supervisor and colleagues said in response to his allegations against his supervisor. However, as I noted above, an applicant's concerns about the fairness of an investigation are not enough to activate s. 22(2)(c).

[23] The applicant has supplemented his s. 22(2)(c) arguments in his reply submission, by arguing that the withheld information was also relevant to his complaint against his union before the Labour Relations Board ("LRB"). The Ministry objects to the applicant's argument on this point, saying that he could and should have raised it in his initial submission. The Ministry's objection is well-founded, as the rules for inquiries clearly state that new issues should not be raised in a reply submission. In any case, I would not, for the following reasons, accept the applicant's arguments about the information's relevance to any determination by the LRB.

[24] The applicant says his complaint to the LRB was still active at the time of the inquiry. He says that he needs to see what his union should have known, if it had asked for disclosure earlier in the grievance process or had allowed the matter to proceed to arbitration, rather than settling his grievance. However, he also acknowledges that he had already made submissions to the LRB, as had his employer and union. He did not, in that light, explain how the withheld information is relevant to his rights in the LRB process.

[25] The relevance of the information to a fair determination of his legal rights in that forum, in his complaint against his union, is not apparent from the information itself. I note, again, that the disputed records relate to an investigation of the applicant's complaint against his supervisor, not to the later investigation about his own workplace conduct. I consider the applicant's arguments about relevance to be speculative at best. Further, they go more towards the perceived unfairness of the investigations, and only tangentially to his complaint before the LRB.

Supply in confidence

[26] The Ministry says that the investigator's usual practice during interviews with employees is to instruct them not to talk about their interviews. His understanding, the Ministry says, was that any information the employees supplied would be treated confidentially and that information would only be shared with excluded management staff on a need-to-know basis. Employees being interviewed would, the Ministry said, understand that any information they provided was in confidence (paras. 5.16-5.19, initial submission).

[27] The Ministry supports this argument with an affidavit from the employee who investigated the applicant's complaint, John Zolpys. He deposed that he had interviewed a number of employees and that his normal practice when conducting internal personnel investigations is

> … to advise employees I interview that he or she must not discuss the conversation with anyone. I do that in order to reinforce the confidential nature of the discussion.

[28] He went on to depose that he does not promise that a witness's statement will not be disclosed to a party to the grievance, because any documents the Ministry relies on will be disclosed to the grievor if the matter proceeds to a formal hearing. John Zolpys also deposed that he keeps such information confidential and that this is understood by employees. He also acknowledged that he could not remember what he had specifically told the employees he interviewed, but says that he believed they understood the information they supplied would be kept confidential.

[29] The Ministry also supplied *in camera* affidavits which support its argument that the investigator conducted his interviews in confidence and that support the conclusion that the employees he interviewed understood that they were providing information in confidence.

[30] In his initial and reply submissions, the applicant vigorously denies that the employees were interviewed in confidence, saying he had seen nothing to support the Ministry's position on this issue. There is no requirement, he says, for investigations into complaints of misuse of managerial or supervisory authority to be conducted in confidence, as there is, for example, in the case of harassment complaints. The investigator was vague in his affidavit about what if any assurances of confidentiality he gave at the beginning of each interview, the applicant argues (paras. 31-37, initial submission; paras. 8-11, 17-18, reply submission).

[31] The applicant supplied affidavits sworn by two fellow employees whom the investigator interviewed. They denied that they had any expectation of confidentiality in providing information during the investigation. The applicant argues that they had to co-operate in the investigation and that they considered that they were "going on the record". The applicant seems to equate "going on the record" – assuming this is in some sense what happened – with his now being given access to what they said. Of course, the fact that employees may have been "on the record" when they were interviewed does not mean they were not providing information in confidence.

[32] I note that only some of the records that relate to interviews, in the form of handwritten notes and transcripts, show that the investigator instructed employees not to discuss their interviews. This does not support the Ministry's argument that it carried out the interviews in confidence. The interview notes do not reflect any assurances of confidentiality that the investigator may have given the interviewees. Again, however, the Ministry's *in camera* affidavit evidence, and an *in camera* letter from a third party, support the Ministry's position on this aspect of the matter.

[33] The Ministry disputes the applicant's argument that his colleagues were obliged to co-operate in the investigation and that therefore any information they gave was not provided in confidence. The obligation to co-operate, the Ministry replied, does not mean that employees were not entitled to expect that the information they provided would be treated confidentially (paras. 11 and 12, reply submission).

[34] The Ministry also argues that employees would be reluctant to participate in complaint or grievance interviews if there was no confidentiality. It provides a number of suppositions in support of this aspect of its case, including that employees would be concerned about possible damage to their working relationships or fear retribution. Again, the Ministry supports this argument with affidavit evidence from the investigator and with *in camera* affidavit evidence.

[35] These harm arguments do not assist the Ministry's that the information was supplied in confidence. They really go, in my view, to the "chilling" argument that public bodies often introduce in such cases, *i.e.*, that investigations or other activities will be compromised if information is released under the Act. Such arguments are really harm arguments and are, in one respect, really a form of resistance to the right of access under the Act. I have rejected this argument on previous occasions. See, for example, para. 9 of Order 01-07.

[36] I have decided on the basis of the *in camera* affidavit material before me that the Ministry has established that the third parties supplied information in confidence and that s. 22(2)(f) is therefore a relevant circumstance that favours withholding the information. It would be preferable, however, to see such assurances specifically noted in the interview records themselves and I encourage the Ministry to ensure that it adopts such a practice in future investigations.

Unfair exposure to harm

[37] The Ministry argues, at paras. 5.20-5. 23 of its initial submission, that third parties would be exposed unfairly to harm if the information is disclosed, since they had a reasonable expectation that the information they supplied would be kept confidential. It says this circumstance, set out in s. 22(2)(e), favours withholding the information.

[38] The Ministry has not explained what harm would be caused or how it might come about. It also says the applicant's grievance has been settled and he has no need to know this information. This latter argument relates more, of course, to the factor in s. 22(2)(c), addressed above, and not the factor found in s. 22(2)(e).

[39] The Ministry has provided me with *in camera* argument and evidence on the s. 22(2)(e) harm issue. While I cannot discuss much of this material, some of which is hearsay, I will say that it is speculative for the most part and is also based on hypothetical scenarios. The investigator in an open part of his affidavit expresses the opinion that the applicant would likely malign and harass others if he received the withheld information. He also has given information in an *in camera* portion of his affidavit which, as he states in an open part of his affidavit, indicates a capacity on the part of the applicant for vindictiveness. Apart from this, the Ministry has provided no evidence or argument about the applicant's past behaviour, including interactions with others, that persuasively support its argument that harm of some kind would ensue from disclosure of information relating to any third-party involvement in the investigation.

[40] The applicant suggests in his reply that the Ministry appears to think he would carry out retribution against his fellow employees if he were to learn their identities. He says this is speculative and says there has been no retribution to date and is not likely to be in the future. He takes exception to being characterized as vindictive and denies that he has ever demonstrated any such behaviour. The Ministry has apparently not provided any evidence of such vindictiveness, he says.

[41] Based on the material before me, including the *in camera* material, I conclude that the circumstance set out in s. 22(2)(e) is not relevant here.

Inaccurate or unreliable information

[42] The Ministry cites one instance in which a third party says the investigator's notes of his interview do not accurately reflect what he said. It argues that, under s. 22(2)(g), this is a relevant circumstance that favours the withholding of the information.

[43] The Ministry has provided a short *in camera* description of this supposedly inaccurate information, but has not explained how the information was inaccurate. It seems to me that, if the information were indeed inaccurate, it would be a simple matter to provide the applicant with a statement to this effect, together with clarification of how the information is inaccurate. I find that s. 22(2)(g) is not relevant here.

[44] **3.5 Unreasonable Invasion of Third-Party Privacy** – For the above reasons, I find that the applicant has not rebutted the presumed unreasonable invasion of privacy found in s. 22(3)(d) as it relates to third-party personal information. Further, the circumstance set out in s. 22(2)(f) favours withholding the remaining disputed third-party personal information. I do not think it is practicable, in light of the principles of severance under s. 4(2) of the Act, to disclose more of what remains withheld, as it would not be possible to do so without unreasonably invading third-party privacy. For that reason, and for the reasons given above, I find that the Ministry has established that it is required to withhold the applicant's own personal information in the withheld records.

[45] This is not, however, the end of the matter. Section 22(5) of the Act, which is quoted above, requires the Ministry to provide a summary in certain circumstances. The applicant has not addressed this section. The Ministry, however, argues that it is not practicable to prepare a summary of personal information about the applicant, as the withheld information about the applicant in these records is so intertwined with that of the third parties. It cannot, the Ministry says, disclose what was said about the applicant without unreasonably invading the privacy of the third parties.

[46] I disagree. The applicant's colleagues and his supervisor were in many cases asked the same or similar questions about the applicant, his allegations against his supervisor, his dealings with others and his account of incidents involving himself and others. They often provided similar responses to these questions. In these cases, while the personal information of the applicant is often intertwined with that of third parties, I believe it is possible to create a summary of the applicant's own personal information as it relates to himself alone, or to workplace events, without revealing the identities of the third parties who supplied this information in confidence. It should also be possible to include the questions in such a summary.

[47] Such a summary will necessarily include some information about third parties, principally the supervisor, where they are mentioned together or where they were involved in incidents with the applicant. In these cases, however, there is no unreasonable invasion of their privacy by disclosing this information to him, as the applicant is aware of these incidents. The applicant will learn more about what was said about him and his allegations, but will not learn who said those things.

[48] There may be instances, in this case, where only one person was in a position to provide the applicant's and third parties' personal information as it relates to an incident or allegation, rendering it impossible to summarize the withheld information without revealing that person's identity. Still other portions of the withheld information relate entirely to third parties and the applicant is not entitled to this information, directly or through a summary under s. 22(5).

[49] Subject to the above qualifications about the summary, I find that s. 22(5) requires the Ministry to provide the applicant with a summary of the disputed information.

4.0 CONCLUSION

[50] For the reasons given above, I make the following orders:

1. Under s. 58(2)(c) of the Act, I find that the Ministry is required by s. 22 of the Act to withhold the information in dispute.

2. Under s. 58(3)(a) of the Act, I require the Ministry to perform its duty under s. 22(5) to, as provided in that section, provide the applicant with a summary of the applicant's personal information in the disputed records.

May 16, 2002

ORIGINAL SIGNED BY

David Loukidelis
Information and Privacy Commissioner
for British Columbia