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"The government said they wanted a strong [Right to Information] law by international standards and these reforms...deliver that and put Newfoundland and Labrador head and shoulders above other Canadian jurisdictions...and show the rest of the country that serious reform in this area is not only possible but a democratic imperative."

- Centre for Law and Democracy Executive Director, Toby Mendel
(April 16, 2015)

Special *ATIPPA* Review Edition

ATIPPA Review Edition

May 27, 2015

Statutory Review of *ATIPPA* Complete; Findings Published

The statutory review of the *Access to Information and Protection of Privacy Act (ATIPPA)* has been completed by the Review Committee. Government has accepted the recommendations of the Committee, resulting in a new access and privacy statute, *ATIPPA, 2015*, which becomes law on June 1, 2015. We encourage all ATIPP Coordinators to review the Report of the 2014 Statutory Review in full - particularly the Executive Summary - which can be accessed via the link on page 12. The Office of the Information and Privacy Commissioner (OIPC) is producing this Special Edition of our newsletter directed at ATIPP Coordinators, aiming to highlight some of the major changes under this new law. It provides a summary of the legislative changes and additions, as well as the procedural impact they have on responding to access requests, dealing with privacy breaches, and working with the Commissioner's Office. It will provide you with some useful information on the major points you need to be aware of in your role as ATIPP Coordinators.

Part of the Report's recommendations includes an expanded educational component for the OIPC and we strive to assist and work with you to ensure the smooth implementation of these legislative and procedural changes. Statutory references throughout this newsletter refer to the new *ATIPPA, 2015*.

A Snapshot of Key Changes to the *ATIPPA*

The Review Committee noted that findings by the Supreme Court of Canada have accorded the right of access to information a quasi-constitutional status and privacy a constitutional status. It also noted the importance of the protection of personal information, particularly in the digital era. In order to achieve both, the Review Committee believed a number of changes to the legislation were necessary, including:

- recasting the chief purpose expressed in the *ATIPPA* to one that facilitates democracy and also speaks to the importance of protecting personal information collected by public bodies;
- substantially widening the application of the public interest test to emphasize public interest as integral to achieving the purpose of the *Act*;
- enhancing the role, duties, and powers of the Information and Privacy Commissioner;
- encouraging preventative measures to protect personal information and enhance data security;
- recommending changes to allow more disclosure of public body records;
- enhancing the role and responsibilities of ATIPP Coordinators;
- revising some of the exceptions to the right of access; and
- making the *Act* more user-friendly by eliminating application fees for all requests and significantly increasing the free research time for general access requests; refocusing the role of the Commissioner; recommending procedural changes to overcome delays; reducing certain time limits; and simplifying complaint and appeal procedures.

The following pages will provide more detail on the above, particularly regarding changes to the roles of ATIPP Coordinators and the OIPC.

Changes to the Role and Responsibilities of ATIPP Coordinators

Role of the ATIPP Coordinator

In noting the key role played by ATIPP Coordinators as those who actually receive and process requests, analyze whether information can be released and generally assist requesters, the Review Committee concluded that a significant change must be made to the current approach to the administration of the *ATIPPA*:

1. more importance should be placed on the role and necessary skills of the ATIPP Coordinator (he/she may consult others only to receive advice on the interpretation and application of the *Act* to the request at hand);
2. except where necessary to respond to the request, requests for information should be anonymized — any information which could identify the applicant should be removed if the request needs to be shared with others in the public body (**Section 12 ATIPPA, 2015**);
3. the Coordinator should be the only person to communicate with the requester, therefore he or she must have delegated authority from the head of the public body to accomplish this task;
4. ATIPP Coordinators must be regarded as experts in their public body and therefore must be provided the training and opportunity to develop the necessary expertise to properly apply the provisions of the *Act*;
5. coordinators must also be seen by their colleagues as having the organizational clout to challenge senior officials to release information, even when it is not politically popular to do so; and
6. the ATIPP Coordinator position must become a role that senior officials aspire to, because of its status in the organization, the expertise that it requires, and the salary that it offers.

“ATIPP Coordinators must be regarded as the access and privacy experts in their public body, and...must be provided the training and opportunity to develop the necessary expertise to properly apply the provisions of the Act.”

**- Page 9
(Executive Summary)**

Duty to Assist (Section 13 ATIPPA, 2015)

In addition to the above, the Report also speaks to the duty of public bodies to assist applicants making requests for information, and the role that ATIPP Coordinators play in fulfilling this duty. While the law sets out that a public body must make a reasonable effort to assist the applicant, the response must be made in a timely manner and the search must be thorough. The Report also highlighted three points underscored by the Commissioner regarding the duty to assist:

- the public body must assist the applicant in the early stages of making a request;
- it must conduct a reasonable search for the requested records;
- it must respond to the applicant in an open, accurate and complete manner; and
- the duty to assist lies with the public body throughout the process.

The Report added that the fundamental underpinning of the duty to assist is good customer service: positive attitude from first contact, ensuring clarity about the information requested, working towards satisfying the requester, and where the information sought cannot be provided - in full or in part - offering an explanation regarding why. At its heart, the key to successfully carrying out the duty to assist is to practice good customer relations - providing the kind of assistance and service that would be provided in a private business.

Fees and Charges (Section 25 ATIPPA, 2015)

A new [Fee Schedule](#) has been made effective as of March 9, 2015. The previous \$5.00 application fee has been eliminated, and a longer “free search” period has been implemented: 10 hours for municipalities and 15 hours for all other public bodies. Only time spent searching for requested records can be counted towards processing costs. This does not include time spent narrowing a request or determining what exemptions should apply. Direct costs (such as photocopying and mailing) will continue to be billed to applicants, but there will be no charges for the creation or supply of any type of electronic record (e.g. PDF, dataset, etc.). Requests for the applicant’s personal information continue to be exempt from all charges.

Additionally, where fee charges arise over and above the “free period”, applicants can request to have the fees waived on the grounds that it would be in the public interest to disclose the information and/or due to their personal financial circumstances. Where fees are not waived under either of these grounds, the previous \$25.00 hourly rate would be applicable.

Any disputes related to fees, including where a public body refuses to waive a fee, can be reviewed by the Commissioner whose decision on such matters is final.



Disregarding Requests (Section 21 ATIPPA, 2015)

Public bodies no longer have the ability to disregard requests unilaterally. Public bodies may wish to disregard requests where they have valid reasons, but decisions of this nature must be submitted to the Commissioner for approval within 5 business days of receipt of the request. If the Commissioner agrees with the public body’s proposal to disregard, a requester could appeal this decision to the Supreme Court Trial Division. If the Commissioner does not approve a public body’s application to disregard an access request, the public body must process the request without delay since the time period for responding to a request is not suspended during consultation with the Commissioner.

“...the presence of [a section allowing public bodies to unilaterally disregard a request for information] in the ATIPPA has obvious implications for how people view the Act, since a refusal by the head of a public body to disclose information can be perceived as self-serving.”

*- Page 13
(Executive
Summary)*



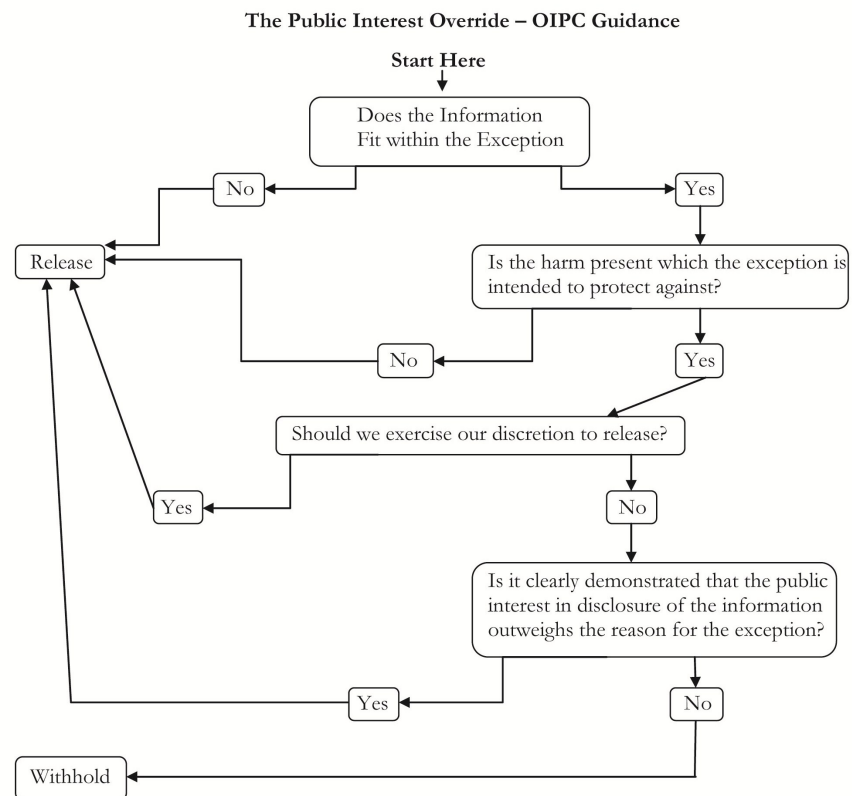
Access to Information Provisions

Public Interest Override in Access Legislation (Section 9 ATIPPA, 2015)

“...it is consistent with the Open Government initiative to proactively release as much Cabinet material as possible, especially on routine matters. Political leaders have an important role to play in the effective functioning of the access to information system. The proactive release of information will better inform the public of the issues involved in policy choices, and it will help foster a culture change that will see more, rather than less information released by public bodies.”

*- Page 17
(Executive Summary)*

This new provision applies to exceptions related to: local public body confidences (s. 28), policy advice or recommendations (s. 29), legal advice (s. 30(1)), confidential evaluations (s. 32), disclosure harmful to intergovernmental relations or negotiations (s. 34), disclosure harmful to the financial or economic interests of a public body (s. 35), disclosure harmful to conservation (s. 36), and disclosure harmful to labour relations interests of a public body as employer (s. 38). Where it is clearly demonstrated that the public interest in disclosure outweighs the reason for utilizing the exception, these exceptions will not apply.



Ministerial Briefing Records

Submissions from the Minister and Deputy Minister of the Office of Public Engagement (OPE) agreed that briefing notes can be compiled in such a way as to enable factual material to be separated from policy advice and recommendations. Given these submissions, the Committee determined to repeal sections 7(4), (5) and (6) as it found it unnecessary to categorically prohibit disclosure of briefing materials. Policy advice and recommendations can still be withheld from disclosure.

Cabinet Confidences (Section 27 ATIPPA, 2015)

The designation of “official Cabinet record” has been removed and the Report has restored the Commissioner’s ability to examine Cabinet records in his oversight function. Mandatory protection for Cabinet records continues, with the exception that the Clerk of

the Executive Council may disclose information that would normally be withheld under this section where the Clerk is satisfied that the public interest in disclosure of the information outweighs the reason for the exception. Additionally, parts of Cabinet records that are factual or background material are excluded from the definition of “Cabinet record.” This background material should be disclosed unless to do so would reveal the substance of Cabinet deliberations, or if another exception applies.

Policy Advice or Recommendations (Section 29 ATIPPA, 2015)

The Committee has maintained the items included in section 29(1)(a), “advice, proposals, recommendations, analyses or policy options developed by or for a public body or minister,” because that wording reflects recent Supreme Court of Canada findings. Section 29(1)(b) is now limited to reports in respect of which updating has been requested within 65 business days of delivery (thereby limiting its application). The previous inclusion of “consultations or deliberations involving officers or employees of a public body, a minister or the staff of a minister” has been omitted.

Solicitor-Client Privilege (Section 30 ATIPPA, 2015)

While the Report concluded that this provision is vital to the interests of society as a whole and essential to the fair and efficient administration of justice, it also noted that this exception carries the potential for abuse. Therefore, the Committee concluded that the Commissioner must be permitted to view records, even where solicitor-client privilege is being claimed, in order to ensure a reasonably efficient and cost-effective way to objectively evaluate the claim of privilege.

Business Interests of a Third Party (Section 39 ATIPPA, 2015)

The intention behind this section is to balance the public’s interest in transparency and accountability, against disclosure that harms business interests. The Committee was satisfied that this was properly accomplished prior to *Bill 29* and reinstated the three-part test that previously existed in section 27 of the *ATIPPA*. In order to be withheld, the information must meet all three conditions: (a) reveal a trade secret, or commercial, financial, labour relations, scientific or technical information of a third party; (b) have been supplied, implicitly or explicitly, in confidence; and its disclosure must result in a reasonable expectation of probable harm as a result of at least one of the circumstances described under condition (c).

Section 19 of the *ATIPPA, 2015* sets out the new criteria for notifying third parties. A public body should now make reasonable efforts to notify a third party only once it has formed the intention to release the information. If a third party objects it can either appeal to the Commissioner or Trial Division, at which time the public body must not release the information in question until the matter has been resolved.

Records to which the ATIPPA does not Apply (Section 5 ATIPPA, 2015)

The scope of section 5 was narrowed giving additional authority to the Commissioner to oversee most records in the custody or control of public bodies. Records that the OIPC cannot review will now only include: court files, judges’ records and judicial administration records; notes, communications, or draft decisions of people acting in a judicial or quasi-judicial capacity; incomplete prosecution proceedings; incomplete RNC investigations; and records that would reveal confidential sources or the information those sources provide to the RNC with respect to a law enforcement matter.

Changes to the Role and Responsibilities of the Commissioner/OIPC

“[the Commissioner] observed that the reason the Office of the Information and Privacy Commissioner was created was ‘[t]o have a timely, cost effective mechanism to deal with this.’ By ‘this,’ he was referring to the need for citizens to be able to challenge refusals by heads of public bodies to disclose requested information, so that their entitlement to access the information is not arbitrarily or wrongly refused or delayed. That observation succinctly summarizes the primary oversight objective and is consistent with the direction in the Terms of Reference ‘to make the Act more user friendly.’”

*- Page 34
(Executive Summary)*

Oversight Model

In an effort to ensure a strong, independent Commissioner, the Committee has created a new oversight model. This new model requires a public body to act quickly once it receives recommendations from the OIPC – either to comply within 10 business days or apply to court seeking a declaration that it is not legally obliged to comply. This new model places the burden of initiating court review, as well as the burden of proof, on the public body. The time available for the OIPC to review an applicant’s request and make recommendation(s) has also been greatly reduced. This will require public bodies to respond very quickly to the OIPC during the complaint process, and will result in shorter Commissioner’s Reports being issued within 65 business days.

The Role of the Commissioner

The Committee determined that in order for the *ATIPPA* to function as it should, the Commissioner must be cast in the role of public watchdog with the responsibilities of both advocate for access as well as protector of personal information. To accomplish this, the OIPC has been given an expanded role with enhanced duties and additional powers as follows.

1. **Audit Power** - The Commissioner is empowered to audit, on his own initiative, the performance of public bodies (including their full range of duties and obligations under the *ATIPPA*). Audit reports will be made public so that other public bodies can also benefit from reviewing the findings, and the public can gain insight into how their access and privacy rights are being upheld. **(Sections 95(1)(b) and 107 *ATIPPA*, 2015)**
2. **Banking System** - The provision allows the OIPC to “bank” additional access or privacy complaints once the Office has five from the same applicant under active consideration. Once one of the five active files is closed, the first banked file is then brought forward for active consideration. This will allow applicants to submit new complaints, while also ensuring the OIPC is able to serve other requesters as well. **(Sections 44(7) and 74(4) *ATIPPA*, 2015)**
3. **Privacy Complaints and Investigations** – The Commissioner can accept complaints related to the collection, use or disclosure of personal information. The OIPC can also initiate privacy investigations on its own motion. A report to the public body post-investigation would have a year to either be complied with or a public body could seek judicial recourse where it disagreed with the Commissioner’s findings. If a public body fails to respond, the OIPC is empowered to file an order of its recommendations in court. **(Section 73 *ATIPPA*, 2015)**
4. **Privacy Impact Assessments (PIAs)** - This provision only applies to government departments, who will be required to carry out PIAs where personal information is involved during the development of new programs or services, and submit them to the Minister responsible for the *ATIPPA* for review and comment. Where such PIAs pertain to common or integrated programs or services where disclosure of personal information may be permitted under section 68(1)(u), the PIAs must also be forwarded to the Commissioner for review and comment. **(Section 72 *ATIPPA*, 2015)**

5. **Research** - It has been recognized that it is necessary for the OIPC to have an independent research function, as well as the financial support that requires, in order to enable it to keep up with developments in technology affecting personal information protection. **(Section 95(1)(e) *ATIPPA*, 2015)**
6. **Education** - The Commissioner has been empowered to take a more active role in facilitating public understanding of the *ATIPPA*, including the responsibilities of all parties, in making the system more effective. **(Section 95(2) (a) and (b) *ATIPPA*, 2015)**
7. **Government Acquisition of Information on its Citizens** - The Commissioner now has the power to “authorize the collection of personal information from sources other than the individual the information is about.” This ensures that the Commissioner is informed, and his authorization has been sought when government wishes to collect information about individual citizens from sources other than the individual (unless those methods are otherwise authorized under the *Act*). **(Section 95(1)(c) *ATIPPA*, 2015)**
8. **Special Reports** – The Commissioner has the authority to make special reports to the House of Assembly related to any matter within the scope of the functions and duties of the OIPC. **(Section 106 *ATIPPA*, 2015)**
9. **Privacy Breach Reporting** - All breaches of privacy must now be reported directly to the Commissioner by public bodies. **(Section 64(4) *ATIPPA*, 2015)**
10. **Legislative Review** - Government is required to consult with the Commissioner on any draft legislation which could have implications for access to information or protection of privacy. **(Section 112 *ATIPPA*, 2015)**

Summary

The Commissioner’s role has been recast to promote and facilitate efficient and timely access to requested information **(Section 95(2)(k) *ATIPPA*, 2015)**, and adopt additional practices to ensure the protection of personal information **(Section 95(2)(g) *ATIPPA*, 2015)**. This includes new practices and procedures to respond quickly and avoid excessive delay in resolving complaints.

The Commissioner has also been given a proactive role as educator on access and privacy to the public and public bodies **(Sections 95(2)(a) and (b) *ATIPPA*, 2015)**, including conducting research to keep on top of the latest developments and concerns, particularly as technological changes continue to affect how we collect, use, disclose, and otherwise handle personal information **(Section 95(1)(e) *ATIPPA*, 2015)**.

The Office’s watchdog role has been enhanced through new powers to audit **(Sections 95(1)(b) and 107 *ATIPPA*, 2015)** and write special reports **(Section 106 *ATIPPA*, 2015)**.

The Commissioner must be consulted to provide advice on the access and privacy impact of new legislation no later than when it is introduced into the legislature **(Sections 95(2)(e) and 112 *ATIPPA*, 2015)**; given the opportunity to review PIAs of government departments in relation to a common or integrated government program or service **(Section 72 *ATIPPA*, 2015)**; and notified by public bodies of all privacy breaches **(Section 64(4) *ATIPPA*, 2015)**.



Commissioner's Independent Review Process

The previous report-writing practices involving detailed analysis of past decisions from this and other Canadian jurisdictions is being replaced with a more streamlined approach which will entail a summary review and assessment process, resulting in a brief report and recommendations when appropriate.

Time Limits and Extensions/Complaints, Reviews and Appeals

To facilitate this new report-writing approach, timelines have been streamlined and “days” have been replaced by “business days.” A business day is defined in section 2(b) *ATIPPA, 2015* as “a day that is not a Saturday, Sunday or a holiday.”

- Full response is required from public bodies within 20 business days of receipt of an access request by a requester. **(Section 16 *ATIPPA, 2015*)**
- A 10-business day time limit requires completion of preliminary record searches, a determination of the extent, effort and time required for a full response, and all of this information to be conveyed to the requester in writing as an “Advisory” response. **(Section 15 *ATIPPA, 2015*)**
- Public bodies are no longer permitted to unilaterally extend the time limit - an extension can only be applied where the Commissioner agrees that it is reasonable. Public bodies must request a time extension no later than 15 business days. **(Section 23 *ATIPPA, 2015*)**
- Within 15 business days of receiving the public body's decision, the requester or third party may file a complaint with the Commissioner, who will then notify the parties they have 10 business days to make representations to the OIPC. **(Sections 42 and 44 *ATIPPA, 2015*)**
- Informal resolution may be attempted, but must be terminated within 30 business days of receipt of the complaint in favour of formal investigation if no resolution has been achieved. However, if both parties submit a written request to continue informal resolution, the Commissioner may extend the process for a maximum of 20 business days. **(Sections 44(4), (5) and (6) *ATIPPA, 2015*)**
- Within 65 business days of receipt of the complaint, the Commissioner must release the report of findings and recommendations. **(Sections 46 , 47 and 48 *ATIPPA, 2015*)**
- The public body has 10 business days to decide whether to comply with the report/recommendations. **(Section 49 *ATIPPA, 2015*)**
- Where the Commissioner has recommended that access be granted and a public body disagrees, it must (within these 10 business days) seek a declaration from the Trial Division stating that it is not required by law to comply, or risk the recommendations being filed by the Commissioner as an order of the court. **(Section 50 and 51 *ATIPPA, 2015*)**
- A requester or third party who is not satisfied with the decision of the public body may appeal to the Trial Division within 10 business days of the public body's decision after receiving a Commissioner's Report. **(Section 54 *ATIPPA, 2015*)**
- Where a party is not satisfied with the outcome and initiates an appeal to court, this begins a new hearing reviewing the decision of the public body. It is not an appeal of the report of the Commissioner. **(Section 59 *ATIPPA, 2015*)**

New Public Body/ATIPP Coordinator Timeline for Requests for Information

Public Bodies						
Day 1	Days 1-5	Days 5-8	Day 10	Days 15-30	Days Beyond 35	
Access Request Received by Public Body	Transfer					
	Request to OIPC to Disregard	OIPC Response				
	Search for, Locate and Gather Records			Day 20 Final Response		
			Advisory Response	Day 15 Deadline to Make Extension Request to OIPC	Final Response (if granted extension)	
			1. Extension Needed			
			2. Fee Estimate	Day 30 Response from Applicant on Fee Estimate	Final Response if Fee Paid	
		3. Notify Third Party	Day 25-39 Response from Third Party	Third Party to OIPC or Court		
				Final Response		

New OIPC Timeline for Reviewing Requests for Information

OIPC						
Day 1	Days 2-11	Days 12-29	Day 30	Days 31-50	Days 50-60	Days 60-65
Complaint received within 15 days of Public Body Response	Public Body Records provided to OIPC and explanation of why information was withheld	Informal Resolution efforts led by the OIPC	Terminate Informal Resolution	Formal Investigation	Formal Report Drafted	Report Issued
			Parties may request an extension to Informal Resolution	Extend Informal Resolution		

Municipalities - Ensuring Transparency and Accountability while Protecting Privacy

The Committee highlighted that submissions on municipalities had revealed how privacy concerns and the right to access information have often collided. The Committee believed that a strict interpretation of privacy provisions has led to a strong reluctance to disclose information.

During the course of the Committee's review, the OPE began addressing this issue by drafting guidelines for use by municipalities as to how to interpret and apply the *Act*. The OPE provided the Committee with a preliminary version of these guidelines but the Committee felt that the guidelines still focused heavily on the need to protect personal privacy without sufficiently ensuring accountability from municipal governments about decisions affecting citizens.

The Committee desired a better balance between protecting personal information and the legislated duty to subject a municipality's activities to public scrutiny in order to ensure that citizens will believe local governments are acting in an open and transparent manner.

The Committee recommended that government develop standards for how municipalities should manage information, and that these standards should be placed in the *Municipalities Act, 1999*. The standards should recognize the need to have full access to information that is brought before a council and on which that council will make decisions impacting the entire community. Once such standards are incorporated into the *Municipalities Act, 1999*, they will prevail over the *ATIPPA*.

The Committee called on the Department of Municipal and Intergovernmental Affairs and Municipalities Newfoundland and Labrador, in consultation with the OIPC and OPE, to establish a list of the information that citizens of a municipality must be able to access, while also keeping in mind the importance of protecting personal privacy.

Additionally, the Committee sought to expand the definition of public body to include entities owned by or created by or for a municipality or group of municipalities. However, there is a change between the Committee's suggested wording and the new law's definition. The *ATIPPA, 2015* definition reads as follows:

Definitions

2. In this Act

(x) "public body" means

(vi) a corporation or other entity owned by or created by or for a local government body or group of local government bodies, which has as its primary purpose the management of a local government asset or the discharge of a local government responsibility

It is intended that this provision will not be proclaimed into law at the same time as the rest of the *ATIPPA, 2015* in order to allow time to identify and train these new public bodies. **(Section 2(x)(vi) *Draft Bill*).**

“...if citizens are to be assured that local governments are carrying out their duties in an open and transparent manner...[it] requires achieving a better balance between protection of personal information and the legislated duty to subject the activities of a public body to public scrutiny.”

**- Page 45
(Executive
Summary)**

Information Management and the Duty to Document

The Committee noted that the previous review of the *ATIPPA* had made several recommendations to enhance the information management systems of public bodies, though there had been no requirement placed on officials to document their decisions. In the interim, between the first and second review, the “duty to document” has gained importance and recognition. It was noted that without proper record-keeping, information and privacy commissioners cannot properly oversee laws on privacy and access to information.

The Committee noted that in the decade that the *ATIPPA* has been in place, focus has mainly been on its access provisions. However, it stressed that the success of the system depends entirely on maintaining reliable records. This requires senior officials to ensure that there is appropriate resource allocation to do a sufficient job of this, as well as an understanding of the essential role of information management within the access to information system. Therefore, it supported the submission of the OIPC to create “a legislated duty on public bodies to document any non-trivial decision relating to the functions, policies, decisions, procedures and transactions relating to the public body.” The Committee also expressed the need for internal policies and procedures to ensure documents created under such a direction are “maintained, protected and retained in proper fashion.”

The Committee concluded by finding that this duty to document should be expressed in the *Management of Information Act*, with its implementation and oversight subject to monitoring or audit and report by the OIPC to the House of Assembly as the Commissioner deems appropriate.



End Notes

Please note that the Independent Statutory Review Committee’s Executive Summary contains the draft bill, *ATIPPA, 2015* at page 78. The *Bill*, as passed by the legislature, can be found at the link on the next page. We encourage you to review the new legislation and familiarize yourselves with the changes it sets out. A nice summary of the findings behind those changes can also be viewed starting at page 77 of the Executive Summary.

Additionally, the ATIPP Office is currently in the process of revising its practice and procedure materials to incorporate the new *ATIPPA, 2015* changes and help assist in its application.

The OIPC has also undertaken to produce a number of guidance materials on specific topics of note within the *ATIPPA, 2015*. Many of these cover, in more depth, some of the noted changes contained in this newsletter (e.g. public interest override, PIAs, etc.). These have been sent out to ATIPP Coordinators and posted on our website for reference as well.

“It should hardly need to be stated that strong information management policies and practices are the foundation for access to information.

Without those policies and practices, there is no certainty that the information being requested exists, or that it is usable even if it does exist.”

***- Page 51
(Executive Summary)***

Resource Guide

- *Access to Information and Protection of Privacy Act, 2015* (Bill)
<http://www.assembly.nl.ca/business/bills/bill1501.htm>
- *ATIPPA, 2015* Fee Schedule
<http://www.atipp.gov.nl.ca/info/fees.pdf>
- Independent Statutory Review Committee - Volume 1: Executive Summary (includes *ATIPPA, 2015*)
http://www.opec.gov.nl.ca/publications/pdf/ATIPPA_Report_Vol1.pdf
- Independent Statutory Review Committee - Volume 2: Full Report
http://www.opec.gov.nl.ca/publications/pdf/ATIPPA_Report_Vol2.pdf
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