OFFICE OF THE INFORMATION AND PRIVACY COMMISSIONER
NEWFOUNDLAND AND LABRADOR

Report A-2019- 016

July 25, 2019

Department of Children, Seniors and Social Development

Summary: The Department of Children, Seniors and Social Development received a request for records relating to the Department's progress in responding to the Calls to Action of the Truth and Reconciliation Commission. The Office of the Information and Privacy Commissioner approved two applications by the Department for an extension of the time limit to respond to the request, and denied a third. The Department delivered the final response to the Complainant 14 months after the request was made, and 11 months after the extended deadline. The Department withheld almost all of the responsive records on the basis of section 27 (cabinet confidences).

The Commissioner found that the section 27 exception had been properly applied, and therefore did not recommend further disclosures. The Commissioner also found that the extraordinary delay in responding to the request was unacceptable, and that the delay resulted from a number of factors, including workload issues, consultations with other departments, and application of a policy on consultations that resulted in conflict with the mandatory provisions of the *Act*. The Commissioner recommended that the Department review its processes to reduce or eliminate such delays.

Statutes Cited: *Access to Information and Protection of Privacy Act, 2015*, SNL 2015, c. A-1.2, ss. 14, 16, 27.

Authorities Relied On: *Report of the 2014 Statutory Review of the Access to Information and Protection of Privacy Act*, Queen's Printer, St. John's, NL, 2015

Access to Information Policy and Procedures Manual, ATIPP Office, Department of Justice and Public Safety, St. John's, NL, 2017.

File #: 0005-112-19-004

I BACKGROUND

[1] On January 18, 2018 the Complainant made a request under the *Access to Information and Protection of Privacy Act, 2015* (the "*ATIPPA, 2015"* or "the *Act"*) to the Department of Children, Seniors and Social Development ("CSSD" or "the Department") for access to records as follows:

> *All records related to the department's progress in fulfilling the province's commitment to implement the Truth and Reconciliation Commission's Calls to Action -- specifically those calls to action numbered 1, 2, 3 and 5. Please provide all records from Nov. 30, 2015 to Dec. 31, 2017.*

[2] The Truth and Reconciliation Commission ("TRC") was established in 2008 by the parties to the settlement of the class action lawsuit by survivors of the Canadian "Indian residential schools system." In 2015, the TRC released a report containing 94 "calls to action" addressed to various levels of government, churches and other bodies. The calls numbered 1, 2, 3 and 5 are primarily concerned with Aboriginal child welfare, and particularly children in care.

[3] The Department's final response to the Complainant under the *Act* was due on February 14, 2018. On February 2, 2018 the Department applied to this Office for an extension of time to respond to the request under section 23 of the *Act*. The application cited the large number of records to be searched, and the necessity of conducting consultations with other bodies. An extension of 10 business days was granted, with a new response deadline of February 28, 2018.

[4] On February 22, 2018 the Department applied for a second extension of time, this time for an additional 60 business days. This application was more detailed, and in addition to the factors raised in the first application, cited unforeseen consultation requirements and major issues with workload and Departmental resources. A partial extension of 40 business days was granted, particularly noting the unique, extensive workload challenges. This resulted in a new deadline of April 26, 2018.

[5] On April 26, 2018, the Department applied for a third time extension, this time for an additional 62 business days. On this occasion, however, the request was denied. This Office was not convinced that an additional extension was justified, because the Department had not demonstrated any substantial unanticipated problems that were not identified in the previous extension request. Because the previously extended deadline had been reached, the Department was now in a position where its failure to provide a final response to the Complainant was deemed to be a refusal of access pursuant to section 16(2) of the *Act.*

[6] The Department notified the Complainant on May 1, 2018 that the extension request had been denied, but that the Department was actively working on the access request. It advised that the responsive records would not be ready until June, but offered to send the Complainant a summary document in mid-May.

[7] On June 1, 2018, the Department wrote to the Complainant to advise that it was unable to provide the intended summary, but that it still intended to provide the final response, with records, before the end of June. In response to subsequent inquiries from the Complainant, the Department wrote in August 2018, September 2018 and February 2019, each time advising the Complainant that the response was to be expected imminently.

[8] The final response was sent to the Complainant on March 27, 2019, fourteen months after the date of the request, and eleven months after the extended final deadline. The Complainant then filed a complaint with this Office, asking that we investigate the Department's delays in responding to the request, and also the very small number of records ultimately received.

[9] As an informal resolution could not be reached, the complaint proceeded to formal investigation in accordance with section 44(4) of the *ATIPPA, 2015*.

II DEPARTMENT'S POSITION

[10] The Department explained, in communications to the Complainant, that the initial search resulted in over 4,000 pages of records, and after review for responsiveness and duplication,

1,000 pages remained. It further advised that the package would require review for redactions, and consultations with other public bodies to determine what could be released.

[11] In addition, the Department told the Complainant that the Department was experiencing a higher volume of requests than normal, and that it was short-staffed and under-resourced.

[12] In later communications with the Complainant, the Department stated that it had been a more complex request than anticipated, due to the volume of records and to the nature of the consultations required.

[13] In various communications with this Office, the Department explained that the request was complex and involved a large number of records, since it focused on one of the largest lines of business of the Department, over a two-year period (its ongoing work with Indigenous children and communities).

[14] The Department also anticipated that consultations with other bodies on the provincial and federal levels might be necessary, but could not determine the extent of consultations until the records had all been reviewed.

[15] The Department also noted that it had workload issues that were unforeseen. The Department does not have a full-time Access and Privacy Coordinator. The part-time Coordinator, in addition to other access requests, was responsible for other records management and administrative work, including civil litigation files, and was then given responsibility for preparing records for the Muskrat Falls Inquiry, which government directed must be given priority.

[16] The Department further noted that it was eventually determined that responsive records related to the TRC calls to action were in the process of being prepared by the Intergovernmental and Indigenous Affairs Secretariat, a division of Executive Council ("IIAS") as part of a submission to Cabinet. Because IIAS had requested these responsive records from CSSD (as well as from other Departments) and because the records had been created or compiled in response to that request from IIAS, it was necessary to consult with IIAS and

the Premier's Office and also with Cabinet Secretariat in order to determine whether any or all of the records were considered cabinet records pursuant to section 27.

III COMPLAINANT'S POSITION

[17] The Complainant provided this Office with an account of the communications he received from the Department, including explanations provided from time to time for the delays.

[18] The Complainant pointed out that of the thousands of pages the Department had been working on for over a year, he received only 24 pages, with 1200 pages being entirely redacted pursuant to section 27 of the *Act* (cabinet confidences).

[19] The Complainant questioned, given his experience communicating with the Department, the explanations the Department gave for the delays, and the repeated statements that the file was near completion, "…whether this disorganization may have resulted in a haphazard job in determining what information to provide to me, and what information to redact."

[20] The Complainant stated that the subject of the access request is a matter of enormous public interest, that it had been several years since the TRC Calls to Action were issued, and that the public deserved to have updates in a timely manner.

IV DECISION

A. Reasonable Search, Location and Redaction of Records

[21] There are two main issues to be dealt with in this Report. The first issue is whether the Department has conducted a reasonable search for, located, and then redacted the records responsive to the request, in light of the fact that out of thousands of pages, only 24 pages have been disclosed to the Complainant.

[22] The Department has explained how the request was initially approached, how it discussed the request with the Complainant to ensure it was properly understood, and how the first

search was conducted. It has explained how, after removing duplicates and non-responsive records, the initial result of approximately 4,000 pages was reduced to around 1,000 pages. I am satisfied that at this stage, which was mid-to-late February, 2018, the Department had located all of the records in the Department's custody that could be responsive to the request. Therefore the Department had at that point fulfilled its duty to conduct a reasonable search for records, as part of its duty to assist the applicant under section 13 of the *Act.*

[23] For the second step, redaction of the responsive records, the Department has claimed that all of the pages withheld from disclosure are required to be withheld pursuant to section 27(1)(h) and 27(2)(a). The relevant provisions of section 27 read as follows:

> *27. (1) In this section, "cabinet record" means*
>
> *(a) advice, recommendations or policy considerations submitted or prepared for submission to the Cabinet;*
>
> *(b) draft legislation or regulations submitted or prepared for submission to the Cabinet;*
>
> *(c) a memorandum, the purpose of which is to present proposals or recommendations to the Cabinet;*
>
> *(d) a discussion paper, policy analysis, proposal, advice or briefing material prepared for Cabinet, excluding the sections of these records that are factual or background material;*
>
> *(e) an agenda, minute or other record of Cabinet recording deliberations or decisions of the Cabinet;*
>
> *(f) a record used for or which reflects communications or discussions among ministers on matters relating to the making of government decisions or the formulation of government policy;*
>
> *(g) a record created for or by a minister for the purpose of briefing that minister on a matter for the Cabinet;*
>
> *(h) a record created during the process of developing or preparing a submission for the Cabinet; and*
>
> *(i) that portion of a record which contains information about the contents of a record within a class of information referred to in paragraphs (a) to (h).*
>
> *(2) The head of a public body shall refuse to disclose to an applicant*
>
> *(a) a cabinet record; or*

> *(b) information in a record other than a cabinet record that would reveal the substance of deliberations of Cabinet.*
>
> *(3) Notwithstanding subsection (2), the Clerk of the Executive Council may disclose a cabinet record or information that would reveal the substance of deliberations of Cabinet where the Clerk is satisfied that the public interest in the disclosure of the information outweighs the reason for the exception.*

[24] The definitions in section 27(1) are extensive. All records that relate to the Cabinet decision-making process are mandatorily excepted from disclosure. This Office has received and reviewed a complete copy of the approximately 1,200 pages withheld from the Complainant, and I am satisfied that they all fall into the definition of cabinet records by way of section 27(1)(h) - a record created during the process of developing or preparing a submission for the Cabinet. Therefore they must be withheld from the Complainant, subject only to the possible exercise of discretion by the Clerk of the Executive Council under the provision of section 27(3). The Department has advised that the records were sent to Cabinet Secretariat for review, and that the Clerk of the Executive Council has reviewed the records and is satisfied that the records do not meet the test for disclosure under section 27(3).

B. Extraordinary Delay

[25] The second issue to be dealt with in this Report is the issue of the extraordinary delay in the response of the Department to the request. In addition to the delay covered by the extensions totalling 50 business days granted by this Office, the Department took an additional 11 months to produce a final response to the Complainant.

[26] It must be noted that this is unprecedented for this Department. The ATIPP Office annual reports show that in 2016-2017, CSSD had a total of 35 access requests. In 31 cases the statutory deadline for response was met, and in the four remaining cases the deadlines were met with extensions. In 2017-2018, there were 27 requests in total. Of those, 25 were met (three with extensions), one was not yet complete and in only one case was the final response late.

[27] On review of the file, the timeline provided and the correspondence, it appears that there are a number of causes for the delay that can be attributed to different problems. I will look at each one briefly in turn.

(a) Interpretation of the Access Request and Nature of the Records

[28] First, there is the difficulty attributed to the large number of records to be searched. In part, this turns on the interpretation of the Complainant's request. The Department argues that the access request specifically relates to Aboriginal children in care and related subjects, and since this is a major part of CSSD's mandate, the number of responsive records would be quite large. However, in early discussions with the Department, the Complainant had clarified that what he was looking for was any reports, documents or e-mails that spoke to the Department's progress in responding to the TRC Calls to Action in the period indicated – in other words, "what had changed" as a result. The Department nevertheless conducted a broad search of records, initially resulting in 4,000 pages.

[29] As early as January 2018, consultations with CSSD policy and program directors had determined that, while there would be thousands of records that related to Aboriginal child care and Indigenous communities, there was no specific mandate or directive to CSSD in regard to the TRC Calls to Action and the Department's progress, and so CSSD would not have records that specifically spoke to that issue, except for those records that would have to be withheld pursuant to section 27. At the same time, the Department was aware that another provincial government body, IIAS, had been given the specific mandate of gathering records from CSSD and a number of other departments, in order to prepare a submission to Cabinet on the TRC Calls to Action.

[30] Consistent with the duty to assist, the Department could have notified the Applicant at that time that most of the records could not be released (similar to the advisory notice in section 15(2)(a)), barring the exercise of discretion by the Clerk. If the Department had proceeded in that way, a response to the Complainant could have been provided by the end of February, within the time period provided by the first extension request. The Complainant then would have known whether records would be forthcoming from the Department.

[31] However, the Department spent the next twelve months in consultations with other departments and, in the end, withheld the 1,200 pages that it had determined in February 2018 were cabinet records. The Department disclosed to the Complainant 24 pages of records that had already been disclosed to organizations outside government.

(b) Consultations

[32] The Department argued that it was necessary to conduct internal and external consultations about the records, and further, that it could not determine the extent of those consultations, or even determine which governmental or other bodies it needed to consult, until after a review of the thousands of pages of records was completed. It was initially believed that it would involve correspondence with government bodies at the federal and provincial level outside the province, as well as internal consultations within the Department. However, it appears from the timeline provided by the Department to our Office that in the end, the only consultations that took place were with other provincial government bodies: Intergovernmental and Indigenous Affairs Secretariat, the Premier's Office and Cabinet Secretariat.

[33] The *ATIPPA, 2015* does not address the process of consultation with other bodies in the course of responding to access requests. The *Access to Information Policy and Procedures Manual* issued by the ATIPP Office provides guidance to public bodies in responding to access requests which contains dozens of references to different types of consultations.

[34] The *Policy Manual*, on page 28, puts the matter in context as follows:

> *An examination of the request and a thorough review of the records will often require internal consultations. When a public body receives a request that deals with records originating in another public body or deals with matters in which another public body has direct interest, it should consult with that public body. This will ensure that all relevant factors are taken into consideration when deciding whether or not to sever information that falls under a discretionary exception to disclosure.*

[35] Neither ATIPP coordinators nor the heads of public bodies to whom they report can be experts on everything. Therefore it is often necessary for a coordinator to consult internally,

for example with subject-matter experts, or with other people within the public body who could be expected to know where responsive records might be located. In addition, it may be necessary to consult with other public bodies for similar reasons.

[36] The *Policy Manual* has specific guidance on certain types of consultations:

> *Depending on the nature of the request, the following may be consulted in addition to appropriate officials within a public body:*
>
> *• Cabinet Secretariat – If the records being sought may contain cabinet confidences (section 27), the public body must consult Cabinet Secretariat before releasing any records or information. The public body must also obtain sign-off from Cabinet Secretariat before a final response is sent to the applicant (see section 4.6.1 of this manual, "Cabinet Confidences" for further information).*
>
> *• Intergovernmental Affairs (IGA) – If the records being sought may relate to intergovernmental relations and negotiations, the public body must consult IGA before releasing any records or information (see section 4.8.6 of this manual, "Disclosure Harmful to Intergovernmental Relations or Negotiations" for further information).*
>
> *• Legal Counsel – If the public body requires legal advice or interpretation of the Act or any other legislation, they should consult with their solicitor (see section 4.8.3 of this manual, "Legal Advice" for further information)*

[37] Of particular relevance in the present case are the first two items above. It became clear to CSSD early in the process of responding to the request, that IIAS was the body directly responsible for coordinating government's efforts in regard to the TRC Calls to Action. Therefore, it was logical to consult with IIAS about records related to that issue.

[38] Indeed, it was as a result of that early consultation that it became apparent to CSSD that many or most of the records it was reviewing were likely to be cabinet records, as they were being gathered by IIAS for the purpose of developing a submission to Cabinet. It therefore became logical to conclude that a consultation with Cabinet Secretariat might be necessary.

[39] Sometimes a coordinator may be uncertain whether section 27 applies to a record, and may want to consult with Cabinet Secretariat, or with another department, to clarify the

question. Sometimes that may be the necessary or wisest course. In the present case, CSSD determined, early in the process, that most or all of the records under review were being gathered by IIAS for the specific purpose of developing a submission to Cabinet. That being the case, it should have been clear to the Coordinator that these records were cabinet records within one or more of the definitions in section 27. The policy regarding consultations was followed even though the response was already beyond the extended deadline. Sometimes, the policy needs to give way to ensure compliance with the legal obligations under the *Act* and the rights of the applicant to a timely response. The decision regarding the application of the section 27 exception rests with the Department.

[40] The entire scheme of the access request process in the *ATIPPA, 2015* places the work of responding to requests in the hands of the ATIPP coordinator. This was one of the main themes in the Report of the 2014 Statutory Review Committee, which emphasized that coordinators ought to be "situated high enough up in the organization where they work to command automatic respect for their functions", that they be trained, and provided with the resources needed to carry out their work. The *Policy Manual*, on page 27, states:

> *As stated by the 2014 Statutory Review Committee, "ATIPP Coordinators assure the efficiency and the credibility of the entire process on a day-to-day basis." The ATIPP Coordinator should be professionally trained and hold a senior position in the organization in order to command respect for their functions under the Act.*

[41] The *Policy Manual* also affirms, on page 28, that:

> *The ATIPP Coordinator should have sole responsibility handling requests made under the Act within the public body. Coordinators may consult others within their public body, but only to receive advice on the interpretation or application of the Act, or to receive assistance in locating or obtaining the information needed to respond to a request.*

[42] When the Coordinator in the circumstances of CSSD concluded that the records under review were cabinet records (as they indeed were), then it ought to have been within the scope of responsibility of the Coordinator to decide that the records must be withheld (subject to the final approval by the head of the public body, as delegated). Had this course been adopted, it

would have been possible to send the Complainant a response as early as the end of February, 2018.

[43] Even acknowledging the amount of time required to consult with IIAS in order to be certain that each of the records under review was clearly related to the Cabinet submission, it still ought to have been possible to provide a response to the Complainant by the end of the second time extension, April 26, 2018.

[44] Unfortunately, even after the Department's third extension request was not approved, the Department felt it necessary to proceed with the consultation process as originally envisaged. According to the Department's timeline, there followed a series of additional consultations. First was continued consultation with IIAS, mainly confirming section 27 redactions. These took until July, 2018, resulting in a final package of responsive records of approximately 1,000 pages, of which the majority was to be withheld under section 27.

[45] The following several months involved additional consultations with IIAS and with the Premier's Office. In September 2018, the Department drafted an information note and a final package for the Deputy Minister – not for disclosure to the Complainant, but for submission to Cabinet Secretariat for a consultation on section 27. That consultation package was not sent to Cabinet Secretariat, however, until late October.

[46] Cabinet Secretariat then wanted more information from CSSD, which required further review and consideration. This occupied the months of November and December, 2018. The package was re-submitted to Cabinet Secretariat in February of 2019. Cabinet Secretariat requested a new consultation package with additional information from both CSSD and IIAS. The third package was submitted for review on March 1, 2019. The Department indicated that approval of the Clerk regarding the use of section 27 was received by the Department on March 27, 2019, and the final response package was sent to the Complainant on that date.

[47] Part of the consultation issue arises from the interpretation of section 27(3), which reads:

> *(3) Notwithstanding subsection (2), the Clerk of the Executive Council may disclose a cabinet record or information that would reveal the substance of*

> *deliberations of Cabinet where the Clerk is satisfied that the public interest in the disclosure of the information outweighs the reason for the exception.*

[48] This provision provides an exception to the rule requiring all cabinet records to be withheld. It grants to the Clerk of Executive Council the discretion to apply a public interest assessment to the disclosure of cabinet records. The *Policy Manual* has, on page 80, interpreted this provision as requiring that every record which would otherwise be withheld under section 27 must be submitted to the Clerk:

> *In order for the Clerk of the Executive Council to exercise his or her discretion under subsection 27(3), all records to which section 27 applies must be forwarded to the Clerk for review prior to finalizing a response to an applicant.*

[49] A policy that required a public body to submit to the Clerk for review, records that it intended to disclose, if it appeared that section 27 might apply, would be an important safeguard against inadvertent disclosure of cabinet records. It is also possible that in keeping with the underlying principles of the *ATIPPA, 2015*, the policy quoted above would be of considerable benefit to an applicant, and to public access to information generally, by allowing some cabinet records to be disclosed, if it were deemed to be in the public interest to do so. At this point in the process, it was this policy that led CSSD to continue to consult with Cabinet Secretariat. The only statutory process that was unfolding was the exercise of discretion by the Clerk under section 27(3).

[50] In this case, the response was already well beyond the statutory deadline and the Department should have considered issuing a response (denying access to the records as they were excepted under section 27) before sending the records to Cabinet Secretariat for the consideration of the Clerk's discretion to release. While the discretion of the Clerk is an important part of the *Act,* in the present case the process of preparing the records to be submitted to Cabinet Secretariat, and the submission and re-submission that followed, added at least six months to the already late final response. That is clearly unacceptable.

[51] In the present case, the excessive delay appears to have been caused by adherence to policy which had created a conflict with the requirements of the *Act*. As explained in the Report of the Statutory Review Committee (page 109), changes to the Cabinet Confidence exception

brought about in 2015 were intended to reduce delays when dealing with access requests for cabinet records:

> *With those safeguards in place, using a basic list of records that are Cabinet confidences and according those records absolute protection from disclosure should result in more efficient management of access to Cabinet records. It should also be easier to use and reduce delays and costs for both the requester and public bodies. In short, it would help to make the ATIPPA more user-friendly.*

In the present case, it has not worked as intended.

[52] It is the prerogative of the Minister responsible for the *ATIPPA, 2015* to create policies that are intended to support the implementation of the *Act*. It is important, however, that policy should not interfere with complying with the Act and in meeting statutory timelines for responding to access requests. Regardless of what other factors contributed to the 14 months' delay in providing the Complainant with a response, it appears that by following the policy of submitting the records to Cabinet Secretariat before releasing its final response, the Department added at least six months' delay in responding to the Complainant, contrary to the statutory time limit provided in section 16 of the *Act,* without any additional records being disclosed to the Complainant as a result.

[53] The principles that appear to underlie the policy could be preserved by applying them in a different way. Coordinators must be empowered to make decisions about access to information requests in a way that does not cause them to violate statutory time limits. If that means that records to which section 27 applies must be withheld from an applicant before having been reviewed by Cabinet Secretariat, in order to provide a response within the statutory time limit, then that is in conformity with both the words and the underlying principles of the *Act.* An applicant who is denied access is free to make a complaint to this Office, and that affords an opportunity for review.

[54] The exercise of discretion under section 27 should be done within the statutory timelines, but when a public body finds itself already beyond, or imminently at risk of exceeding those timelines, and further extensions are not available, it is consistent with the duty to assist and the scheme of the *Act* as a whole to provide a response as soon as possible, in order to allow the Applicant to avail of appeal processes without further delay.

(c) Workload Issues

[55] The consultation process was not the only cause of delay. It was also exacerbated by the workload issues to which the Department was subject during the period under review. First, the Department does not have a full-time ATIPP Coordinator. There was a backup coordinator, but that person had only part-time ATIPP responsibilities.

[56] During the period under review, the Coordinator had ongoing responsibilities for other time-sensitive work, including annual reports, cabinet paper reviews and various policy and program development tasks. Given that it is usually impossible to foresee when a large access request may arrive, any part-time coordinator will find it difficult to manage that kind of work-load. The backup coordinator also has a full-time, time-sensitive workload, in addition to ATIPP responsibilities.

[57] In the present case, the problem was compounded when at the same time this access request arrived, the Coordinator was given responsibility for searching for and compiling records that were required for the Muskrat Falls Inquiry. The government directed that this task be given priority. However, it does not appear that any additional resources were allocated to it.

[58] The result was that the Department, when faced with all of the tasks assigned to it, had to make choices. As a result, the Department requested time extensions for the access request, and when the third such request was denied, it continued with its consultations, until the process was completed.

[59] A public body should take steps to eliminate or reduce causes of delays. As the *Policy Manual* states, consultations ought to be used only to obtain advice. Responsibility for decision-making remains with the Department in accordance with the *ATIPPA, 2015*.

V RECOMMENDATIONS

[60] Under the authority of section 47 of the *Access to Information and Protection of Privacy Act, 2015,* I recommend that the Department of Children, Seniors and Social Development:

1. continue to withhold from the Complainant the records originally withheld pursuant to section 27 of the *Act*;

2. review its access to information process in detail to determine the causes of delays, and implement measures to reduce or eliminate such delays, including

   (a) staff resources tasked with dealing with access to information requests, and

   (b) the length of time devoted to consultations;

3. comply in future with the statutory duties imposed upon it by sections 13 and 16 of the *Act*, to respond to an applicant in an open, accurate and complete manner, without delay, and in any event within the statutory deadlines, including keeping the applicant informed, maintaining open communication throughout the process, and providing the applicant with the necessary information so they can exercise their rights under the *Act*, including the right to file a complaint regarding a deemed refusal.

[61] As set out in section 49(1)(b) of the *ATIPPA, 2015*, the head of the Department of Children, Seniors and Social Development must give written notice of his or her decision with respect to these recommendations to the Commissioner and any person who was sent a copy of this Report within 10 business days of receiving this Report.

[62] Dated at St. John's, in the Province of Newfoundland and Labrador, this 25th day of July, 2019.

Victoria Woodworth-Lynas
Information and Privacy Commissioner (A)
Newfoundland and Labrador