

ALBERTA

**OFFICE OF THE INFORMATION AND PRIVACY
COMMISSIONER**

ORDER F2025-21

May 27, 2025

CITY OF EDMONTON

Case File Number 005569

Office URL: www.oipc.ab.ca

Summary: On February 16, 2017, an individual (the Applicant) made an access request under the *Freedom of Information and Protection of Privacy Act* (the FOIP Act) to the City of Edmonton (the Public Body) for certain information.

The Public Body located 17 pages of responsive records. On March 20, 2017, the Public Body informed the Applicant that it was providing him with access to the records but was withholding some information in the records under sections 17(1) (disclosure harmful to personal privacy), and 27(1) (privileged information) of the FOIP Act.

On February 21, 2017, this Office received a request from the Applicant to review the Public Body's decision to withhold the responsive information from him under sections 17(1) and 27(1) of the FOIP Act.

On September 6, 2017, during the course of a judicial review proceeding commenced by the Applicant regarding the Public Body's decision to ban him from its facilities, the Public Body was ordered by the Court to disclose certain redacted information in its Certified Record of Proceedings, which included some information which it had withheld from the Applicant under the FOIP Act in the 17 pages of records that were responsive to his access request, to the Applicant for the purpose of the judicial review proceeding.

On April 24, 2018, the Commissioner authorized a Senior Information and Privacy Manager to investigate the Public Body's decision to withhold the remaining responsive information in the 17 pages of records under sections 17(1) and 27(1) and to try to settle the matter.

Thereafter, on June 20, 2018, the Public Body voluntarily disclosed further additional information in the responsive records to the Applicant. It continued to withhold the remaining information under sections 17(1) and 27(1) of the FOIP Act.

On June 29, 2018, the Applicant requested an inquiry into the Public Body's decision to withhold the responsive information from him under sections 17(1) and 27(1) of the FOIP Act.

On February 1, 2019, the Commissioner agreed to conduct an inquiry.

On March 10, 2025, the Public Body disclosed additional information to the Applicant; it continued to withhold the remaining responsive information under sections 17(1) and 27(1)(a) of the FOIP Act.

The Adjudicator found that the Public Body properly applied section 17(1) to withhold the information in the responsive records. Accordingly, it was not necessary for the Adjudicator to determine whether the Public Body also or in the alternative, properly withheld the information under section 27(1)(a).

Statutes Cited: AB: *Freedom of Information and Protection of Privacy Act*, R.S.A. 2000, c. F-25, ss. 1, 17, 27, 71, and 72.

Orders Cited: AB: Orders F2019-06, F2019-07, F2023-02, F2024-02 and F2024-28.

I. BACKGROUND

[para 1] On February 16, 2017, an individual (the Applicant) made an access request under the *Freedom of Information and Protection of Privacy Act*, R.S.A. 2000, c. F-25 (the FOIP Act) to the City of Edmonton (the Public Body) for the following information:

On March 31, 2016, [Employee A], foreman of the Hardisty swimming pool made a false police report. [Employee B] and [Employee C] of Corporate Security also spoke to EPS. I request that the information provided to EPS as well as records of all contacts with EPS be released to me. Section 3.03 of attached directive A1450 requires you to keep all those records.

[para 2] The time period specified by the Applicant for his access request was "From March 10, 2016 to February 16, 2017".

[para 3] The Public Body assigned file #2017-P-0082 to the Applicant's access request and conducted a search. It located 17 pages of records responsive to the Applicant's access request.

[para 4] On March 20, 2017, the Public Body responded to the Applicant. The Public Body informed the Applicant that it was providing him with access to the records but was withholding

some information in the records under sections 17(1) (disclosure harmful to personal privacy), and 27(1) (privileged information) of the FOIP Act. It also advised him that it had withheld information that was non-responsive to his request.

[para 5] On April 21, 2017, the Applicant submitted a Request for Review/Complaint form to this Office requesting the Commissioner review the Public Body's application of section 17(1) and section 27(1) to withhold responsive information.

[para 6] During this time, the Applicant had also commenced an application in the Alberta Court of Queen's Bench (now the Court of King's Bench) for judicial review of the Public Body's decision to ban him from the Public Body's recreation facilities. The Public Body and the Edmonton Police Service (the EPS) were named as the Respondents.

[para 7] As part of the judicial review proceedings, the Public Body submitted records to the Court in a redacted form, which it advised in this inquiry included almost all of the 17 pages of responsive records that it had provided the Applicant in response to his access request under the FOIP Act.

[para 8] The Applicant then brought a preliminary application before the Court in the judicial review proceeding, seeking an order directing the Public Body and the EPS to remove all redactions from their respective Certified Record of Proceedings.

[para 9] On September 6, 2017, the Court ordered the Public Body and the EPS to "each file an amended Certified Record of Proceedings without redactions for the names, job titles and signatures of the witnesses and complaint [sic] for all documents contained in the Certified Records of Proceedings including the records disclosed to [the Applicant] per the *Freedom of Information and Protection of Privacy Act*, RSA 2000, c F-25. All other redactions in the Certified Records of Proceedings shall remain in place".¹

[para 10] The Public Body then filed an amended Certified Record of Proceedings in the judicial review proceeding. It continued to withhold information in the 17 pages of responsive records it had provided to the Applicant in response to his access request under the FOIP Act.

[para 11] On April 24, 2018, the Commissioner authorized a Senior Information and Privacy Manager to investigate the Public Body's decision to withhold the remaining responsive information in the 17 pages of records under sections 17(1) and 27(1) and to try to settle the matter.

[para 12] Thereafter, on June 20, 2018, the Public Body voluntarily disclosed some additional information in the responsive records to the Applicant. It continued to withhold the remaining information under sections 17(1) and 27(1) of the FOIP Act.

[para 13] On June 29, 2018, the Applicant requested an inquiry into the Public Body's decision to withhold the responsive information from him under sections 17(1) and 27(1) of the FOIP Act.

¹ Order of Justice Gill pronounced September 6, 2017 (the Court Order).

[para 14] On February 1, 2019, the Commissioner agreed to conduct an inquiry and delegated her authority to conduct the inquiry to me.

[para 15] On February 3, 2025, the Public Body provided me and the Applicant with a copy of the unredacted/replacement pages from the Certified Record of Proceedings that were made part of the Record after the order of Justice Gill. These pages showed the information the Public Body originally withheld under the FOIP Act but disclosed to the Applicant at the order of Justice Gill for the purpose of the judicial review proceeding.

[para 16] On March 10, 2025, the Public Body disclosed further information on page 5 of the records to the Applicant that it had previously withheld.

[para 17] The Public Body continued to withhold a limited amount of information in the 17 pages of responsive records under sections 17(1) and 27(1)(a).

II. RECORDS AT ISSUE

[para 18] Prior to this access request, the Applicant had made the following access requests to the Public Body:

- The Applicant's access request dated April 5, 2016 (Public Body's File No. 2016-P-0134), and
- The Applicant's access request dated May 13, 2016 (Public Body's File No. 2016-P-0183)

[para 19] He subsequently requested a review and an inquiry into the Public Body's decision to withhold information in the records responsive to each of these access requests.

[para 20] Order F2024-02 addressed the Public Body's decision to withhold information in the responsive records that were the subject of the Public Body's file number 2016-P-0134 (this Office's file number 002962). Order F2024-28 addressed the Public Body's decision to withhold information in the responsive records that were the subject of the Public Body's file number 2016-P-0183 (this Office's file number 003479).

[para 21] Some of the records, or information in the records, that was responsive to these two prior access requests, was also responsive to the Applicant's access request that is the subject of this inquiry. As a result, decisions regarding the Public Body's application of the FOIP Act to withhold these overlapping records or overlapping information have already been made in Order F2024-02 (file number 002962) and Order F2024-28 (file number 003479).

[para 22] I informed the parties that any information that was withheld in records that were the subject of Orders F2024-02 or F2024-28 would not be re-considered in this inquiry, as decisions regarding the Public Body's application of exceptions under the FOIP Act to withhold that information had already been made in the two previous Orders.

[para 23] I further informed the parties that in this inquiry I would only be considering the information *which remains withheld* under the FOIP Act by the Public Body in the responsive records after all disclosures, whether voluntary, Court ordered, or as ordered to be disclosed in Orders F2024-02 and F2024-28, to the Applicant. In other words, I would *not* be reviewing any information in the responsive records which was originally withheld by the Public Body under the FOIP Act from the Applicant, *but which has now been disclosed* to the Applicant *for any reason*.

[para 24] Consequently, as set out in the Notice of Inquiry, as amended, the only information that remains withheld in the 17 pages of responsive records and is the subject of this inquiry is as follows:

Page	Description	Information withheld
5	Incident Report	Third party's name, address and telephone number
7	Incident Report	Witness's address and phone number
11	Incident Report (first page)	Third party's address, telephone number and date of birth
13	Incident Report (last page)	Employee's payroll number

[para 25] The Public Body applied section 17(1) and section 27(1)(a) to withhold this information. The Public Body provided me with a copy of the unredacted and redacted records for review for this inquiry.

III. ISSUES

[para 26] The Notice of Inquiry, dated March 13, 2025, as amended, states the issues for this inquiry as follows:

1. Does section 17(1) of the FOIP Act (disclosure an unreasonable invasion of personal privacy) apply to the information in the records?
2. Did the Public Body properly apply section 27(1)(a) to the FOIP Act (privileged information) to the information in the records?

Preliminary Matter - Scope of Inquiry

[para 27] In his submission, the Applicant alleged that the Public Body failed to comply with the Order of Justice Gill pronounced September 6, 2017. I have no authority to review or comment on the compliance of the Public Body with the Court's Order. The Applicant's reasons for not pursuing a review of the Public Body's alleged non-compliance with the Court's Order

with the Court, are not relevant to this inquiry. I can only review the information that remains redacted in the records to determine whether section 17(1) and/or section 27(1)(a) of the FOIP Act were properly applied by the Public Body to withhold the information.

IV. DISCUSSION OF ISSUES

1. Does section 17(1) of the FOIP Act (disclosure an unreasonable invasion of personal privacy) apply to the information in the records?

[para 28] None of the information the Public Body withheld under section 17(1) is personal information about the Applicant. It is all information about someone else that the Applicant seeks to have disclosed to him.

[para 29] Section 17(1) of the Act states:

17(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.

[para 30] For section 17(1) to apply, the withheld information must first be found to be personal information and second, the disclosure of the information must be determined to be an unreasonable invasion of the third party's personal privacy.

[para 31] Section 17(1) is a mandatory exception: if the information falls within the scope of the exception, it must be withheld.

[para 32] In Order F2019-07 the Adjudicator discussed section 17 and explained the analysis that is to be undertaken when information is withheld under section 17(1), as follows:

[para 22] Section 17 does not say that a public body is never allowed to disclose third party personal information. It is only when the disclosure of personal information would be an unreasonable invasion of a third party's personal privacy that a public body must refuse to disclose the information to an applicant under section 17(1). Section 17(2) (not reproduced) establishes that disclosing certain kinds of personal information is not an unreasonable invasion of personal privacy.

[para 23] When the specific types of personal information set out in section 17(4) are involved, disclosure is presumed to be an unreasonable invasion of a third party's personal privacy. To determine whether disclosure of personal information would be an unreasonable invasion of the personal privacy of a third party, a public body must consider and weigh all relevant circumstances under section 17(5), (unless section 17(3), which is restricted in its application, applies). Section 17(5) is not an exhaustive list and any other relevant circumstances must be considered.

[para 24] Section 17(1) requires a public body to withhold information once all relevant interests in disclosing and withholding information have been weighed under section 17(5) and the conclusion is reached that it would be an unreasonable invasion of the personal privacy of a third party to disclose his or her personal information.

[para 25] Once the decision is made that a presumption set out in section 17(4) applies to information, it is necessary to consider all relevant factors under section 17(5) to determine whether it would, or would not, be an unreasonable invasion of a third party's personal privacy to disclose the information.

[para 26] However, it is important to note that section 17(1) is restricted in its application to personal information. Before a public body may apply section 17(1), it must first determine whether the information in question is personal information or that it is likely to be so. In this case, I must consider whether the information to which the Public Body has applied section 17(1) is personal information.

[para 33] Where a record contains personal information of a third party, section 71(2) places the burden on the applicant to prove that disclosure of the information would not be an unreasonable invasion of the third party's personal privacy. Section 71(2) states:

71(2) Despite section (1), if the record or part of the record that the applicant is refused access to contains personal information about a third party, it is up to the applicant to prove that disclosure of the information would not be an unreasonable invasion of the third party's personal privacy.

[para 34] Accordingly, in determining whether section 17(1) applies, the first question that must be answered is whether the information that is the subject of this inquiry consists of personal information of a third party.

Is the withheld information personal information of a third party?

[para 35] Section 1(n) defines personal information under the Act:

1 In this Act,

...

(n) "personal information" means recorded information about an identifiable individual, including

- (i) the individual's name, home or business address or home or business telephone number,*
- (ii) the individual's race, national or ethnic origin, colour or religious or political beliefs or associations,*
- (iii) the individual's age, sex, marital status or family status,*
- (iv) an identifying number, symbol or other particular assigned to the individual,*
- (v) the individual's fingerprints, other biometric information, blood type, genetic information or inheritable characteristics,*

- (vi) *information about the individual's health and health care history, including information about a physical or mental disability,*
- (vii) *information about the individual's educational, financial, employment or criminal history, including criminal records where a pardon has been given,*
- (viii) *anyone else's opinions about the individual, and*
- (ix) *the individual's personal views or opinions, except if they are about someone else;*

[para 36] The definition of “personal information” under section 1(n) is non-exhaustive. Other information not enumerated in section 1(n) can also be found to be personal information under the FOIP Act.

[para 37] Section 1(r) of the Act provides the following definition of “third party”:

1 In this Act,

...

- (r) *“third party” means a person, a group of persons or an organization other than an applicant or a public body;*

[para 38] On page 5 of the responsive records, the Public Body withheld a third party's name, address and telephone number. In its letter to me and to the Applicant dated March 10, 2025, the Public Body stated that “[t]his information that is still redacted appears to be personal information (crossed out at some point but still readable) including a name, address and phone number”.

[para 39] The information withheld on page 5 is still legible and it is not about the Applicant. The third party's name, address and telephone number are their personal information under section 1(n)(i) of the FOIP Act.

[para 40] On page 7 of the responsive records, the Public Body disclosed a witness's name but withheld their address and phone number. The witness is a third party, and their address and phone number are their personal information under section 1(n)(i) of the FOIP Act.

[para 41] Page 11 is the first page of a three-page incident report (pages 11 – 13) which was completed by an employee (the Employee) of the Public Body.

[para 42] On page 11, the Public Body disclosed the name of a witness but withheld their date of birth, address and phone number. The witness is a third party, and their date of birth, address and phone number are their personal information under sections 1(n)(i) and (iii).

[para 43] The Public Body disclosed all of the information on the second page of the incident report (page 12 of the responsive records) to the Applicant.

[para 44] The Employee's name appears on the third page of the incident report (page 13 of the responsive records) and was disclosed to the Applicant along with the employee's phone number. The only information that remains redacted on page 13 is the Employee's payroll number.

[para 45] Whether employee payroll numbers are personal information was considered by the adjudicator in Order F2019-06. At paragraph 26 the adjudicator stated:

[para 26] The Public Body has withheld the payroll numbers of one Public Body employee and one City employee, under section 17(1). Previous Orders have noted that employee identification numbers fall within the list of personal information in section 1(n) (specifically, under section 1(n)(iv)). In Order F2009-009, the adjudicator found that employee identification numbers have a personal dimension such that section 17(1) can apply (at para. 80) because it can be used to track the actions of an employee. In this case the payroll number of the Public Body is clearly used for this purpose. Because payroll numbers can be linked to an employee's pay, benefits, and similar human resource-related information, I agree that it has sufficient personal dimension such that section 17(1) can apply.

[para 46] I concur with the conclusion of the adjudicator in Order F2019-06 and find that the Employee's payroll number on page 13 is personal information about the Employee under section 1(n)(iv) of the FOIP Act and information to which section 17(1) applies.

[para 47] The next question to be answered is whether the disclosure of the information I have found to be personal information, to the Applicant, would be an unreasonable invasion of the third parties' personal privacy and, with respect to the Employee's personal information on page 13, the Employee's personal privacy.

Would the disclosure of the personal information be an unreasonable invasion of the third parties' personal privacy?

[para 48] Section 17(2) of the FOIP Act sets out the situations in which a disclosure of personal information *is not* an unreasonable invasion of a third party's personal privacy. None of these situations apply to the withheld personal information.

[para 49] Section 17(3) provides that the disclosure of personal information under subsection (2)(j) is an unreasonable invasion of personal privacy if the third party whom the information is about has requested the information not be disclosed.

[para 50] None of the information withheld by the Public Body is information to which section 17(2)(j) applies. Accordingly, section 17(3) does not apply in this case.

[para 51] Section 17(4) of the FOIP Act sets out the situations in which a disclosure of personal information is presumed to be an unreasonable invasion of a third party's personal privacy.

[para 52] The Public Body submitted that section 17(4)(g) applied to the information withheld under section 17(1).

[para 53] Section 17(4)(g) of the FOIP Act states:

17(4) A disclosure of personal information is presumed to be an unreasonable invasion of a third party's personal privacy if

...

(g) the personal information consists of the third party's name when

(i) it appears with other personal information about the third party, or

(ii) the disclosure of the name itself would reveal personal information about the third party,

[para 54] I find that section 17(4)(g)(i) or (ii) applies to the personal information of the individuals withheld on pages 5, 7, 11, and of the Employee on page 13 and accordingly, disclosure of their personal information is presumed to be an unreasonable invasion of their personal privacy.

[para 55] The Applicant argued that section 17(4)(b) applied, which states:

17(4) A disclosure of personal information is presumed to be an unreasonable invasion of a third party's personal privacy if

...

(b) the personal information is an identifiable part of a law enforcement record, except to the extent that the disclosure is necessary to dispose of the law enforcement matter or to continue an investigation,

[para 56] However, the Public Body did not assert that the presumption under section 17(4)(b) applied and consequently, there is no presumption raised by the Public Body under this section for the Applicant to rebut. Furthermore, the Applicant did not present any evidence that the withheld information was an identifiable part of a law enforcement record or provide any explanation or argument how the disclosure of the withheld information was necessary to dispose of a law enforcement matter or to continue an investigation.

[para 57] Section 17(5) states that in determining under subsections (1) and (4) 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 those set out in sections 17(5)(a) – (i).

Section 17(5) Analysis

[para 58] Section 17(5) of the Act states:

17(5) *In determining under subsections (1) and (4) 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*

- (a) the disclosure is desirable for the purpose of subjecting the activities of the Government of Alberta or a public body to public scrutiny,*
- (b) the disclosure is likely to promote public health and safety or the protection of the environment,*
- (c) the personal information is relevant to a fair determination of the applicant's rights,*
- (d) the disclosure will assist in researching or validating the claims, disputes or grievances of aboriginal people,*
- (e) the third party will be exposed unfairly to financial or other harm,*
- (f) the personal information has been supplied in confidence,*
- (g) the personal information is likely to be inaccurate or unreliable,*
- (h) the disclosure may unfairly damage the reputation of any person referred to in the record requested by the applicant, and*
- (i) the personal information was originally provided by the applicant.*

[para 59] The Public Body advised that it considered the factors set out in section 17(5) of the FOIP Act. It determined that none of these factors weighed in favour of disclosing the personal information of the third parties and the Employee, and therefore, the disclosure of the redacted portions of the records would be an unreasonable invasion of the third parties' and the Employee's personal privacy.

[para 60] As mentioned above, once it is determined that the withheld information is personal information about a third party, pursuant to section 71(2) of the FOIP Act, the burden to prove that disclosing the third party's personal information would not be an unreasonable invasion of the third party's privacy is on the applicant.

[para 61] In his submission, the Applicant argued that section 17(5)(c) of the FOIP Act applied. He argued that this information was required "so that the Applicant not be at a disadvantage in conducting his complaints related to inappropriate collection, use, and disclosure of personal information as well as his request for change of personal information".

[para 62] The Applicant argued that the personal information of the third parties and the Employee was relevant to the fair determination of his rights with respect to complaints he made to this Office that the Public Body had collected, used and disclosed *his personal information* in contravention of the FOIP Act, and to a review he asked this Office to conduct of the Public Body's decision not to correct personal information *about him* in its records.

Section 17(5)(c)

[para 63] As noted by the adjudicator in Order F2023-02 at paragraph 50, four criteria must be fulfilled in order for section 17(5)(c) to apply:

[para 50] Section 17(5)(c) weighs in favour of disclosure where the personal information is relevant to a fair determination of the Applicant's rights. Four criteria must be fulfilled for this section to apply:

- (a) the right in question is a legal right which is drawn from the concepts of common law or statute law, as opposed to a non-legal right based solely on moral or ethical grounds;
- (b) the right is related to a proceeding which is either existing or contemplated, not one which has already been completed;
- (c) the personal information which the appellant is seeking access to has some bearing on or is significant to the determination of the right in question; and
- (d) the personal information is required in order to prepare for the proceeding or to ensure an impartial hearing. (Order F2008-012 at para. 55, Order F2008-31 at para. 112)

[para 64] With respect to the complaint or complaints the Applicant has made to this Office alleging that the Public Body collected, used and disclosed his personal information in contravention of the FOIP Act, the Applicant has not explained how *the personal information of the third parties and the Employee* that remains withheld by the Public Body:

- i) has any bearing on or is significant to the determination of his complaint that the Public Body collected, used and disclosed *his personal information* in contravention of the FOIP Act, and
- ii) is required in order to prepare for the proceeding or to ensure an impartial hearing into his complaint that the Public Body had collected, used and disclosed *his personal information* in contravention of the FOIP Act.

[para 65] Accordingly, I find that section 17(5)(c) does not apply in favour of disclosing the third parties' and the Employee's personal information to him.

[para 66] The Applicant further argued in his submission that section 17(5)(c) was relevant to a fair determination of his separate request that this Office review the Public Body's decision not to correct his personal information in records he received from the Public Body.

[para 67] If the Applicant made a request to this Office for a review of the Public Body's decision not to correct the Applicant's personal information in its records under the FOIP Act, which is active at some stage in this Office, the Applicant has not explained how *the personal information of the third parties and the Employee* that remains withheld by the Public Body:

- i) has any bearing on or is significant to the review of the Public Body's decision regarding his request to have *his personal information* corrected under the FOIP Act, and
- ii) is required in order to prepare for the proceeding or to ensure an impartial hearing into the determination of his rights as they relate to his correction request of *his personal information* under the FOIP Act.

[para 68] Accordingly, assuming there is an active request before this Office from the Applicant for a review of the Public Body's decision not to correct *the Applicant's personal information* in its records, I find that section 17(5)(c) does not apply in favour of disclosing the third parties' and the Employee's personal information to the Applicant.

[para 69] In summary, I find that the third parties' personal information and the Employee's personal information that has been withheld by the Public Body in the responsive records is not relevant to, or required for any complaint the Applicant has made to this Office that the Public Body collected, used or disclosed *his personal information* in contravention of the FOIP Act, or relevant to or required for any review the Applicant has requested by this Office of the Public Body's decision not to correct *his personal information* in its records under the FOIP Act.

[para 70] I also note that in the event that the Applicant's request that this Office review the Public Body's decision regarding his request that the Public Body correct his personal information, is no longer active or ongoing for any reason, then the requirement identified at paragraph 50 in Order F2023-02 that "the right is related to a proceeding which is either existing or contemplated, not one which has already been completed" in order for section 17(5)(c) to apply, has also not been met.

[para 71] I have found above that section 17(4)(g)(i) or (ii) applies to the personal information of the third parties and the Employee withheld by the Public Body and therefore disclosure of this information is presumed to be an unreasonable invasion of the third parties' and the Employee's personal privacy.

[para 72] I find that there are no factors in section 17(5) that weigh in favour of disclosing the third parties' or the Employee's personal information to the Applicant.

[para 73] I find that the Applicant has failed to prove on a balance of probabilities, that the disclosure of the third parties' and the Employee's personal information to him would not be an unreasonable invasion of their personal privacy as required by section 71(2) of the Act.

[para 74] I confirm the Public Body's decision to withhold the personal information of the third parties on pages 5, 7 and 11 and the Employee's personal information on page 13 pursuant to section 17(1) of the Act.

[para 75] As I have found that the Public Body properly withheld the personal information under section 17(1) of the FOIP Act, it is not necessary for me to consider whether the Public Body also or in the alternative, properly applied section 27(1)(a) to withhold this information.

V. ORDER

[para 76] I make this Order under section 72 of the FOIP Act.

[para 77] I confirm the Public Body's decision to withhold the personal information of the third parties and the Employee under section 17(1) of the FOIP Act.

Carmen Mann
Adjudicator
/kh