

ALBERTA

OFFICE OF THE INFORMATION AND PRIVACY COMMISSIONER

ORDER PIPA2025-04

October 9, 2025

ALBERTA TEACHERS ASSOCIATION

Case File Number 025376

Office URL: www.oipc.ab.ca

Summary: The Applicant made a request for access to the Alberta Teachers Association (the Organization) for records containing his personal information under the *Personal Information Protection Act* (PIPA). The Organization located responsive records but severed some information from them as either not being his personal information or as the information of other individuals.

The Applicant requested review by the Commissioner.

At the inquiry, the Organization alleged bias on the part of the Commissioner.

The Adjudicator found that the Organization had not established that it had a reasonable apprehension of bias. The Adjudicator confirmed that the Organization's severing decisions were authorized by PIPA.

Statutes Cited: AB: *Personal Information Protection Act*, S.A. 2003, c. P-6.5, ss. 1, 24, 47, 49, 49.1, 52

Authorities Cited: AB: Order P2006-004

Cases Cited: *Lavesta Area Group Inc. v. Alberta (Energy and Utilities Board)*, 2011 ABCA 108 (CanLII); *Lavesta Area Group Inc. v. Alberta (Energy and Utilities Board)*, 2012 ABCA 84 (CanLII)

I. BACKGROUND

[para 1] The Applicant made an access request to the Alberta Teachers Association (the Organization) under the *Personal Information Protection Act* (PIPA) for the following information:

I am requesting all communication regarding myself that was made between any members and non-members of the ATA (teacher, non-teaching staff, superintendent, board member, board, staff of the ATA) the public; and including the press [...]

[para 2] In a response dated November 3, 2021, the Organization provided records to the Applicant but severed some information from them.

[para 3] The Applicant requested review by the Commissioner of the Organization's response to the access request.

[para 4] In its submissions, the Organization stated that it has a reasonable apprehension of bias on the part of the Information and Privacy Commissioner and does not believe an adjudicator receiving a delegation from the Commissioner could decide the inquiry issues fairly. Before proceeding with the issues set for inquiry, I will consider whether the Organization has established that it has a reasonable apprehension of bias. If so, then the issue of bias must be addressed prior to conducting the inquiry. If not, the inquiry will proceed.

II. INFORMATION AT ISSUE

[para 5] The information severed from records is at issue.

III. ISSUES

Preliminary Issue: Has the Organization established that it has a reasonable apprehension of bias?

Issue A: Was the information the Organization withheld the Applicant's personal information?

Issue B: If the Organization refused to provide access to the Applicant's personal information in its custody or control, did it do so in accordance with section 24(3) of the Act (mandatory grounds for refusal)?

Issue C: If the withheld records contain or consist of personal information of the Applicant, and if section 24(3) of the Act applies to these records, is the Organization reasonably able to sever the information to which these sections apply, and provide the personal information of the Applicant, as required by section 24(4)?

IV. DISCUSSION OF ISSUES

Preliminary Issue: Has the Organization established that it has a reasonable apprehension of bias?

[para 6] The Organization states in its submissions:

Procedural Fairness Concerns in this Matter

37. The Association submits that, due to multiple breaches of the duty of fairness throughout this process, a reasonable apprehension of bias has been created such that a reasonable person viewing the matter would likely conclude that the Commissioner's decision to refer the matter to Inquiry could not have been decided fairly. Further, given that the Applicant was advised to include the Association's withdrawal from mediation as grounds for the review, and the corresponding implication that the decision to withdraw was somehow improper, the Association understandably needed to ensure that there was information before the Adjudicator to explain its decision to withdraw. As such, all of this information is now inappropriately before the Adjudicator. As such, the Adjudicator is now privy to information that should have been confidential. For the reasons outlined below, the events that occurred prior to the Inquiry give rise to a reasonable apprehension of bias.

i. The Mediation was not a neutral process

The mediation was not a neutral process because the mediator blatantly favoured one party over the other and the Commissioner exerted influence on the mediation process.

As outlined by [a representative of the Organization] in her Affidavit, the Association decided to withdraw from what it correctly understood to be a voluntary process, based on practical and business reasons internal to the Association.

During the February 13, 2023 phone call from [the senior information and privacy manager's supervisor], which occurred seemingly at the instruction of the Commissioner, [the representative] was shocked that the OIPC was reacting so strongly to the Association's withdrawal. [The representative] felt that the Association was being pressured to carry on with the voluntary mediation process.

Shortly after the Association withdrew, the Applicant filed his Request for Inquiry that was clearly the result of the OIPC incorrectly informing him that the Association had "declined to participate in mediation". When [a representative of the Organization] requested that the OIPC decline to hold an inquiry based on insufficiency in the Request for Inquiry, the Commissioner instructed [the senior information and privacy manager (SIPM)] to contact the Applicant to clarify the issues for the inquiry.

This resulted in [the SIPM's] July 21, 2023 private email to the Applicant wherein she gave him explicit instructions on how to perfect his Request for Inquiry, again seemingly at the instruction of the Commissioner.

Importantly, [the SIPM] did not instruct the Applicant to exclude reference to the Association's withdrawal from mediation (which would have been appropriate) but rather directed him to include it.

This email alone is enough to create a reasonable apprehension of bias in the mediation process. It clearly shows that [the SIPM] was actively assisting the Applicant in this matter, at the expense of fairness to the Association. Further, the communications provided suggest that [the SIPM] may have been doing so at the instruction of the Commissioner. As a result, it appears that the Commissioner, the head of the adjudicative arm of the OIPC, may have been heavily and actively involved in providing assistance (through [the SIPM]) to the Applicant to perfect his Request for Inquiry.

Further, based on [the SIPM's] July 21, 2023 email, it is evident that other private communications took place between the OIPC and the Applicant that haven't been disclosed to the Association. [The SIPM's] statement, "[a]s we both know, there has never been (to my knowledge) an organization that has declined to participate", strongly implies that she had other private communications with the Applicant. In essence, it appears that multiple conversations occurred between the Commissioner and [the director] and [the SIPM], and then [the SIPM] took the results of these communications back to the Applicant. The Association does not have any record of these communications, and there is no way of knowing what exactly was said in these communications.

[para 7] The SIPM concluded the investigation / mediation process with a mediation overview letter. This letter states:

The Commissioner makes the final decision if an inquiry is granted and what the issues are. Based on the remaining concerns of the Applicant, the issues likely to be addressed in the inquiry are:

1. Was the information the Organization withheld the Applicant's personal information?
2. If the Organization refused to provide access to the Applicant's personal information in its custody or control, did it do so in accordance with section 24(3) (mandatory grounds for refusal)? In particular, a. Does section 24(3)(b) (information revealing personal information about another individual) apply to certain requested records or parts thereof?
3. If the withheld records contain or consist of personal information of the Applicant, and if section 24(3)(b) applies to these records, is the Organization reasonably able to sever the information to which these sections apply, and provide the personal information of the Applicant, as required by section 24(4)?

[para 8] The issues that the SIPM proposed to be decided at an inquiry are limited to the question of whether the information severed from the records is personal information, and if so, whether it is intertwined with the information of another person.

[para 9] The Applicant completed a request for inquiry form. This form indicated that the Applicant wanted the following issue decided at inquiry:

I'm filing an Inquiry because the Alberta Teachers Association has declined to participate in mediation and I would like a review.

[para 10] The Organization requested that the Commissioner make a decision under section 49.1 of PIPA not to conduct an inquiry.

[para 11] The Commissioner directed a SIPM to contact the Applicant to clarify the issues for inquiry. The SIPM emailed the Applicant and explained that the issue of the Organization's participation at the mediation was not one that could be decided at inquiry; she referred him to the issues set out in the mediation overview letter as issues that could be addressed.

[para 12] The Applicant's subsequent "request for inquiry" form states:

1. Was the information the Alberta Teacher's Association withheld my personal information?
2. When the Alberta Teacher's Association refused to provide access to the personal information in its custody or control, did it do so in accordance with section 24(3) (mandatory grounds for refusal)? In particular, Does section 24(3)(b) (information revealing personal information about another individual) apply to certain requested records or parts thereof?
3. If the withheld records contain or consist of my personal information, and if section 24(3)(b) applies to these records, is the Organization reasonably able to sever the information to which these sections apply, and provide the personal information of me, as required by section 24(4)?
4. The Alberta Teacher's Association refuses to participate in mediation with regards to this case. it refuses to provide the documents to the Office of the Privacy Commissioner.
5. At a hearing on April 16, 2023 the Alberta Teacher's Association maintained that the request for this information had become "stale dated". That the request for information and Inquiry has taken "too long" (26 months), and so they "withdrew" from mediation. It is ironic that the Alberta Teacher's Association is maintaining that the request is "stale dated" while their own processes that involve this information is still going on.

[para 13] The Commissioner decided to conduct an inquiry in relation to three issues:

Issue A: Was the information the Organization withheld the Applicant's personal information?

Issue B: If the Organization refused to provide access to the Applicant's personal information in its custody or control, did it do so in accordance with section 24(3) of the Act (mandatory grounds for refusal)?

Issue C: If the withheld records contain or consist of personal information of the Applicant, and if section 24(3) of the Act applies to these records, is the Organization reasonably able to sever the information to which these sections apply, and provide the personal information of the Applicant, as required by section 24(4)?

[para 14] The Commissioner did not refer the issue of the Organization's participation in mediation to inquiry.

[para 15] I understand the Organization to argue that the mediation process was not neutral. It points to the fact that Commissioner directed the SIPM to contact the Applicant regarding his request for inquiry as evidence that the Commissioner is not neutral. As the Organization is concerned that the Commissioner may not be neutral, it reasons that any adjudicator delegated by the Commissioner would also be unlikely to decide the matter fairly.

How does a matter come to inquiry under PIPA?

[para 16] Section 47 of PIPA enables an applicant to request review by the Commissioner. It states, in part:

47(1) To ask for a review or initiate a complaint under this Part, an individual must,
(a) in the case of a request for a review, deliver a written request for review to the Commissioner, or

(b) in the case of a complaint, deliver a written complaint to the Commissioner.

(2) A written request for review to the Commissioner for a review of a decision of an organization must be delivered within

(a) 30 days from the day that the individual asking for the review is notified of the decision, or

(b) a longer period allowed by the Commissioner.

[para 17] The Commissioner may then appoint a person to investigate and attempt to mediate:

49 The Commissioner may authorize a person to investigate and attempt to mediate and, where possible, to mediate a settlement of any matter under review or relating to a complaint.

The process set out in section 49 is not mandatory or binding and contemplates that the SIPM will investigate and try to mediate a settlement. There are no clear consequences for participating or not

participating in the process set out in section 49. This process is dissimilar to binding mediation processes where a mediator may be a decision maker. A person authorized under section 49 of PIPA may *attempt* to settle a matter, but has no authority to settle or decide the matter if the parties are not in agreement. As some of the provisions governing an organization's response are mandatory – i.e., there is no discretion for the organization to release information subject to a mandatory exception to an applicant – the scope of the mediation may be limited to investigating what the parties' issues are and explaining how the provisions of PIPA may apply to those issues.

[para 18] Section 49.1 authorizes the Commissioner to refuse to conduct an inquiry. It states:

49.1(1) Without limiting section 36(2), the Commissioner may refuse to conduct an investigation or review or may discontinue an investigation or review if the Commissioner is of the opinion that

(a) the written request for review or the written complaint is frivolous or vexatious or is not made in good faith, or

(b) the circumstances warrant refusing to conduct or to continue an investigation or review.

(2) The Commissioner must give written notice of a decision under subsection (1) to

(a) the individual who requested the review or initiated the complaint,

(b) the organization concerned, if the organization was given a copy of the written request for review or written complaint by the Commissioner under section 48, and

(c) any other person to whom the Commissioner gave a copy of the written request for review or written complaint under section 48.

The Commissioner may refuse to conduct an inquiry in two circumstances: if the Commissioner forms the opinion that a request for review is frivolous / vexatious / not made in good faith, or the Commissioner decides that the circumstances warrant refusing to conduct a review. In other words, a request for review will proceed to inquiry unless the Commissioner decides that section 49.1(1)(a) or (b) authorizes refusing to conduct one.

[para 19] In deciding whether the circumstances warranted refusing to conduct an inquiry under section 49.1, there is no reason that the Commissioner cannot obtain information regarding the circumstances in question. On the contrary, the legislation directs the Commissioner to examine the circumstances to determine whether they warrant refusal.

[para 20] In this case, the Applicant's request for review, made under section 47, contained issues that are reviewable under PIPA while the request for inquiry raised a different issue that cannot be the subject of an inquiry under PIPA. The issues raised in the request for review relate to the severing decisions of the Organization and whether they were authorized under PIPA.

[para 21] PIPA requires an applicant to submit a request for review, but does not contemplate that an applicant will submit a request for inquiry. The "request for inquiry" form (no longer in use) was

developed by this office to assist applicants to clarify outstanding issues and to indicate their level of interest in proceeding to inquiry.

[para 22] The request for review indicated the Applicant's issue was the redaction of information in the Organization's response; the request for inquiry made no reference to seeking the redacted information and contained a single unrelated issue that cannot be addressed at an inquiry under PIPA. The issue in the request for review, which the Commissioner is required to consider when making a decision under section 49, had not been settled or resolved.

[para 23] The Commissioner had the SIPM investigate into the circumstances by contacting the Applicant. The Applicant then submitted a new request for review. While the issue of the Organization's participation in the mediation continued to be listed as an issue, the Applicant also included the issue of severing, which was the basis of the request for review.

[para 24] I note that in the letter to the Organization of August 15, 2023, the Commissioner said the following:

As the Organization will be aware from the Court's decision in *Alberta Teachers' Association v. Alberta (Information and Privacy Commissioner)*, 2011 ABQB 19, my process for deciding whether to conduct an inquiry does not require that I seek submissions from the parties. However, in this case, because I had received a submission from the Organization that was not copied to the Applicant, my Staff Member was instructed to contact the Applicant to clarify the issues for the inquiry, given the Organization's objection to the Applicant's stated issue for the inquiry. On August 5, 2023, the Applicant sent a revised Request for Inquiry to me and to the Organization, re-stating his issues for the inquiry.

I will now allow the Organization to make one last written submission on the Applicant's re-stated issues for the inquiry, before I decide whether to conduct an inquiry. This time, I ask the Organization to copy the Applicant on its submission, which is due on August 30, 2023. If the Applicant wishes, the Applicant will then have an opportunity to provide a written reply submission to me and to the Organization, by September 13, 2023. Thereafter, I will decide whether to conduct an inquiry for Case File 025376.

[para 25] Once the Applicant clarified that he was also seeking an inquiry in relation to the issues as set out by the SIPM in the mediation overview letter, which relate to the issues raised in the request for review, the Commissioner provided the Organization with the opportunity to make further submissions.

[para 26] The Commissioner referred the issues originally raised by the request for review to inquiry. The Commissioner did not refer the issue regarding the extent of the Organization's participation in mediation to inquiry. That issue is not before me. In effect, the Organization was successful when it challenged the appropriateness of the issue the Applicant raised in the original request for inquiry.

[para 27] I am unable to conclude that the Commissioner's direction to the SIPM to communicate with the Applicant regarding the issues for inquiry is evidence of bias. The Commissioner must consider all circumstances under section 49.1, and asking the SIPM to speak with the Applicant regarding the issues he wanted reviewed was a means to do that. This office provides information about the office's processes and the legislation to parties who request such information. The Organization has not provided any evidence to support finding that the SIPM provided *advice* in the letter of July 21, 2023 to the Applicant, as opposed to providing information about procedures, nor has it established that the

SIPM would not have provided the Organization with information regarding this office's procedures had it requested any. There is nothing before me to suggest that the Commissioner and the SIPM did anything other than comply with their duties under PIPA.

[para 28] In *Lavesta Area Group Inc. v. Alberta (Energy and Utilities Board)*, 2011 ABCA 108 (CanLII), Rowbotham J.A. in deciding to grant leave to appeal, said the following at paragraphs 16 – 17 regarding establishing a reasonable apprehension of bias:

A reasonable apprehension of bias captures the requirement that justice be seen to be done: *Wewaykum Indian Band v Canada*, 2003 SCC 45 at para 67, [2003] 2 SCR 259. The question is whether a reasonable, informed, person viewing the matter realistically and practically and having thought the matter through, would think it was possible that, consciously or unconsciously, the adjudicator would decide unfairly: *Committee for Justice and Liberty v National Energy Board* (1976), [1978] 1 SCR 369 at 394, 1976 CanLII 2; *RDS* at para 11. Put another way, the test for reasonable apprehension of bias is “whether a reasonable and right-minded person, with full knowledge of the facts, would have a reasonable apprehension that the [adjudicator] was biased in relation to this case?”: *R v LaFramboise*, 1997 ABCA 172 (CanLII), 200 AR 75 at para 10, 34 WCB (2d) 501.

Included in the analysis of reasonable apprehension of bias is the presumption of impartiality. The applicant must rebut this and as the respondents correctly point out, mere suspicion of bias is insufficient: *Boardwalk REIT LLP v Edmonton (City)*, 2008 ABCA 176 at para 29, 437 AR 199; *Lavesta Area Group v Alberta (Energy and Utilities Board)*, 2009 ABCA 155. The respondents point to the several reasons which the Commission gave for concluding that there was no reasonable apprehension of bias. The Commission's decision of course hinged in part on its conclusion that there had been no contravention of the guidelines. In this case, McGee was involved in hearing panels related to the transmission line during the proceedings which resulted in the EUB's conduct considered in Decision 2007-075. I am persuaded that the applicant has raised a *prima facie* meritorious ground of appeal. The issue of whether this raises a reasonable apprehension of bias is of significance to this action, and to the practice.

[para 29] In *Lavesta Area Group Inc. v Alberta (Energy and Utilities Board)*, 2012 ABCA 84 (CanLII) the Alberta Court of Appeal determined that a finding of bias may require evidence of a “closed mind”:

In determining if there is a reasonable apprehension of bias, it is relevant to note the alleged source of bias. Here it does not relate in any way to the personal conduct of Mr. McGee. He was not on the panel conducting the failed facility hearing that was sitting contemporaneously with the activities of the private security consultant, nor is it shown that he had any involvement in those activities. There is no evidence on this record that he has a closed mind, and that he is not able to fairly consider the matters before him. It is not suggested that there is any animosity between him and the participants in the hearing, nor is there any suggestion of pre-judging. His disqualification must depend on an absolute rule that anybody associated with the prior hearings will be reasonably apprehended to be biased. That is contrary to *Wewaykum Indian Band*.

[para 30] From the foregoing cases I understand that there is a presumption that an adjudicator is impartial. To establish bias, an applicant must rebut this presumption, and establish that a reasonable, informed person, viewing the matter realistically and practically, and having thought the matter through, would think it possible that consciously, or unconsciously, the adjudicator would decide unfairly or with a closed mind.

[para 31] The Organization has not brought any evidence to establish that I have prejudged the matter of whether its severing decisions were authorized under PIPA or will decide the questions set for

inquiry unfairly. Further, I was not associated with the mediation and my knowledge of what took part in the mediation arises solely from the parties' submissions.

[para 32] I am unable to find that the Organization has established a reasonable apprehension of bias. The inquiry will proceed.

Issue A: Was the information the Organization withheld the Applicant's personal information?

[para 33] Section 1(1)(k) of PIPA defines "personal information" for the purposes of PIPA. It states:

*1(1) In this Act,
(k) "personal information" means information about an identifiable individual [...]*

[para 34] PIPA regulates the collection, use, and disclosure by organizations of personal information. PIPA also authorizes individuals to make access requests for their personal information. The application of PIPA is restricted to personal information. In other words, individuals may request information about themselves under PIPA, but not other kinds of information. There is no authority under PIPA to request information that is not personal information or to direct an organization to provide such information to an applicant.

[para 35] In Order P2006-004, former Commissioner said the following about personal information under PIPA at paragraphs 11 – 14:

My jurisdiction over information requests under the *Personal Information Protection Act* is limited to access requests *for personal information*. Sections 24 and 46(1) of the Act combine to confer my jurisdiction. They provide:

24(1) Subject to subsections (2) to (4), on the request of an individual for access to personal information about the individual and taking into consideration what is reasonable, an organization must provide the individual with access to the following:

*(a) **the individual's personal information** where that information is contained in a record that is in the custody or under the control of the organization;*

*46(1) An individual who makes a request to an organization **respecting personal information about that individual** may ask the Commissioner to review any decision, act or failure to act of the organization. [emphasis added]*

The Act defines "personal information" as "information about an identifiable individual". In my view, "about" in the context of this phrase is a highly significant restrictive modifier. "About an applicant" is a much narrower idea than "related to an Applicant". Information that is generated or collected in consequence of a complaint or some other action on the part of or associated with an applicant – and that is therefore connected to them in some way – is not necessarily "about" that person. In this case, only a part of the information that the A/C asked for was information "about" him. Had he relied on PIPA to obtain information, he would not have received much of the information that was made available to him under the *Legal Profession Act* and the Rules created thereunder, or pursuant to the requirements of fairness.

As noted, the A/C's requests arose in the context of a series of complaints against the Law Society's members under the *Legal Profession Act*, and appeals from dismissals of these complaints, under the Law Society's complaints process.

Although in some of the A/C's later communications to the Law Society he said he was asking for his "personal information", the information requests that are the subject of this inquiry were initially not made as requests for his "personal information". Nor did the A/C initially make any reference to the *Personal Information Protection Act*. Rather, the requests – made between February and early April, 2005 – were broader and more general – for the complaint files and appeal binders that related to his complaints. Similarly, the Law Society's early communication with the A/C did not appear to contemplate the requirements of the Act. Its responses were likely based on its practice of providing information that is necessary to file an appeal to a complainant whose complaint has been dismissed.

In the foregoing excerpt, Commissioner Work noted that information generated in proceedings relating to an individual, as in this case, is not necessarily *about* the individual.

[para 36] The requested information in this case is information generated in relation to hearings involving the Applicant.

[para 37] The Organization argues:

In sum, the Group A Records [records 7, 17-18, 26, 28, 30-31, 38-40, 526-532] are communications internal to the Association regarding employment duties and organization of work, and have been withheld because, although parts may be related to the Applicant, they are not about the Applicant and as such are not his personal information.

[para 38] The position of the Organization is that not all the information in the records is about the Applicant. The Organization withheld some information from records 7, 17 – 19, 26 – 32, 38 – 41, 526 – 532 on the basis that it was not the Applicant's personal information.

[para 39] From my review of the records, I agree with the Organization that the information it severed on the basis that it was not the Complainant's personal information is not, in fact, the Complainant's personal information. While the Applicant's name appears in places in these records, the name is there to identify a matter, not to provide information about the Applicant. At most, the severed information relates to the Applicant or is associated with the Applicant, as opposed to being "about the Applicant".

[para 40] I find that the Organization was not required to provide the information it severed from records 7, 17-18, 26, 28, 30-31, 38-40, and 526-532.

Issue B: If the Organization refused to provide access to the Applicant's personal information in its custody or control, did it do so in accordance with section 24(3) of the Act (mandatory grounds for refusal)?

[para 41] Section 24(3) prohibits an organization from disclosing information about another individual to an applicant. It states:

24(3) An organization shall not provide access to personal information under subsection (1) if

- (a) the disclosure of the information could reasonably be expected to threaten the life or security of another individual;*
- (b) the information would reveal personal information about another individual;*
- (c) the information would reveal the identity of an individual who has in confidence provided an opinion about another individual and the individual providing the opinion does not consent to disclosure of his or her identity.*

If the personal information of an applicant is also the personal information of another individual, then section 24(3)(b) prohibits an organization from providing the information to an applicant.

[para 42] The Organization argues that some information it severed is the personal information of third parties. It relies on section 24(3)(b), above, to withhold this information from the Applicant.

[para 43] I agree with the Organization that the information it withheld from the Applicant under section 24(3) is about another individual. As a result, section 24(3) requires the Organization to withhold the information from the Applicant.

Issue C: If the withheld records contain or consist of personal information of the Applicant, and if section 24(3) of the Act applies to these records, is the Organization reasonably able to sever the information to which these sections apply, and provide the personal information of the Applicant, as required by section 24(4)?

[para 44] Section 24(4) of PIPA requires an organization to consider whether it can sever information under section 24(3)(b) and provide the remaining information to an applicant. It states:

24(4) If an organization is reasonably able to sever the information referred to in subsection (2)(b) or (3)(a), (b) or (c) from a copy of the record that contains personal information about the applicant, the organization must provide the applicant with access to the part of the record containing the personal information after the information referred to in subsection (2)(b) or (3)(a), (b) or (c) has been severed.

[para 45] From my review of the records, I am satisfied that the Organization did sever the personal information of individuals under section 24(3)(b) of PIPA and then provided the remainder of the information to the Applicant. The Organization severed only the information necessary to meet its duty under section 24(3)(b).

[para 46] I find that the Organization met its duty under section 24(4) of PIPA.

V. ORDER

[para 47] I make this Order under section 52 of the Act.

[para 48] I confirm the decisions of the Organization to sever information under section 24(3)(b).

[para 49] I confirm the decision of the Organization not to provide information to the Applicant that was not his personal information within the terms of section 1(1)(k) of PIPA.

Teresa Cunningham
Adjudicator