



OFFICE OF THE INFORMATION
AND PRIVACY COMMISSIONER
NEWFOUNDLAND AND LABRADOR

2024-2025 Annual Report





OFFICE OF THE INFORMATION
AND PRIVACY COMMISSIONER

NEWFOUNDLAND AND LABRADOR

November 5, 2025

The Honourable Paul Lane
Speaker of the House of Assembly
Newfoundland and Labrador

I am pleased to submit to you the Annual Report for the Office of the Information and Privacy Commissioner in accordance with section 9 of the **Transparency and Accountability Act**, section 105 of the **Access to Information and Protection of Privacy Act, 2015**, and section 82 of the **Personal Health Information Act**. This Report covers the period from April 1, 2024, to March 31, 2025.

As Commissioner, I am privileged to oversee the work of OIPC and to provide guidance and leadership. I am pleased to report on the results from the 2024-2025 commitments in our Activity Plan of 2023-2026. Former Acting Commissioner Jackie Lake Kavanagh provided leadership from April to November 2024, and myself from December 2024 to March 2025.

Yours truly,

Kerry Hatfield
Information and Privacy Commissioner

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[APPENDIX C](#) – Timelines (business days) for Privacy Complaints for the 2024-2025 Reporting Period under the **Access to Information and Protection of Privacy Act, 2015**



COMMISSIONER'S MESSAGE

I am pleased to present the Office of the Information and Privacy Commissioner's ("OIPC's") Annual Report for the 2024-2025 fiscal year. In a democratic society, the right of access to information held by public bodies and custodians is a cornerstone of accountability and transparency. In Newfoundland and Labrador, this right is enshrined in the **Access to Information and Protection of Privacy Act, 2015** ("ATIPPA, 2015") and the **Personal Health Information Act ("PHIA")**, granting citizens the ability to examine how decisions are made, how public funds are allocated, and how public institutions serve the public interest. This Office remains steadfast in its commitment to ensuring that these rights are respected, upheld, and where appropriate, strengthened. We will diligently monitor any efforts to restrict access rights, provide guidance to public bodies and custodians in fulfilling their statutory obligations, and advocate for legislative reforms that reflect contemporary realities and maintain the integrity of access to information rights.

Over the past year, it is readily apparent, from our work as well as what we hear from public bodies and custodians, that access to information continues to experience significant demands, as citizens seek greater insight into a broad range of issues, including health care, education, government expenditures, and policing. OIPC has worked diligently with complainants, public bodies, and custodians alike to facilitate appropriate disclosure of records and ensure compliance with legislative timelines. As with any legislation, challenges in the application of ATIPPA, 2015 continue to arise for all parties engaged in the access to information process. With a legislative review of ATIPPA, 2015 forthcoming, OIPC looks forward to engaging collaboratively in that process, with the aim of advancing legislative

improvements that better support all stakeholders and modernize the statutory framework to meet the needs of the future.

The post-COVID years have brought back the desire to meet in person, collaborate, and learn from each other. OIPC hosted the **Access, Privacy, Security, and Information Management Conference** (“APSIM”) in November 2024 that brought together experts in access, privacy, information security, and information management from across Newfoundland and Labrador. The APSIM Conference was highly attended and was an opportunity for everyone working in access and privacy to come together in person to share experiences and learnings across private and public sectors. Given the success of APSIM, OIPC intends to continue to bring parties together to discuss challenges and success stories.

OIPC is proud to continue its active participation in both **Right to Know Week** and **Data Privacy Week**, two key initiatives that highlight the fundamental rights we work to uphold. **Right to Know Week**, celebrated annually across Canada, raises awareness of the public’s right to access information and reinforces the importance of open, accountable, and transparent government. **Data Privacy Week**, recognized internationally, serves as a reminder that privacy is a shared responsibility. It empowers individuals to better understand and protect their personal information, while encouraging businesses and organizations to safeguard data and foster trust in a rapidly changing digital world. Together, these initiatives reflect our ongoing commitment to promoting both transparency and privacy as cornerstones of a healthy democracy.

OIPC continues to see growing public demand for information. The right of access to information can be a challenging one to fulfill for public bodies, particularly smaller ones with few resources and little experience, and even larger ones that may be struggling with many complex requests. For that reason, it is more important than ever that the ATIPP Office within Executive Council is available to support and guide public bodies through the process. This not only helps public bodies through the process of responding to a request, but it ultimately supports the public who make these requests by helping ensure they get a more thorough and timely response. There has been some growth in the resources available to public bodies to assist with access to information requests which is welcome by all.

As technology continues to advance at a rapid pace, protecting privacy must remain a top priority for this Office and for all public bodies and custodians. Safeguarding personal information and personal health information has never been more vital. OIPC has worked tirelessly in its dual role: empowering citizens by raising awareness of their privacy rights, while also serving as the regulator that upholds those rights across the province. Looking ahead, our Office will remain vigilant in monitoring emerging technologies, assessing their impact on privacy, and advocating for strong legislation to ensure privacy remains at the heart of every new development and innovation in our province.

This Report reflects a period under the capable leadership of my predecessor, Jacqueline Lake Kavanagh, whose dedication, and steady guidance helped steer OIPC forward, and we thank her sincerely for her service. Stepping into the role of Information and Privacy Commissioner, I have seen firsthand the energy, skill, and commitment our team brings to safeguarding privacy and promoting access to information. The depth of experience within OIPC not only strengthens our work but makes a real difference in the lives of citizens across the province every day.

Kerry Hatfield
Information and Privacy Commissioner

ABOUT US

MANDATE

The Office of the Information and Privacy Commissioner (OIPC) for the Province of Newfoundland and Labrador is an independent statutory office of the House of Assembly. The Commissioner has a broad range of responsibilities and powers under both the **Access to Information and Protection of Privacy Act, 2015** (ATIPPA, 2015) and the **Personal Health Information Act** (PHIA).

OIPC oversees compliance with ATIPPA, 2015 and PHIA. Oversight of these Acts includes conducting reviews of decisions, investigating and attempting to resolve complaints about access to information and protection of privacy involving public bodies under ATIPPA, 2015 and custodians of personal health information under PHIA, and making recommendations in order to uphold the Acts and encourage better compliance.

ATIPPA, 2015

ATIPPA, 2015 applies to more than four hundred public bodies, including government departments, agencies, boards, commissions, crown corporations, public educational bodies, NL Health Services, and municipalities, and gives individuals the right to access records of a public body, including their own personal information, subject to specific limited exceptions, and the right to correct their own personal information. ATIPPA, 2015 provides for protection of privacy by establishing requirements public bodies must follow for the collection, use, storage, and disclosure of personal information.

PHIA

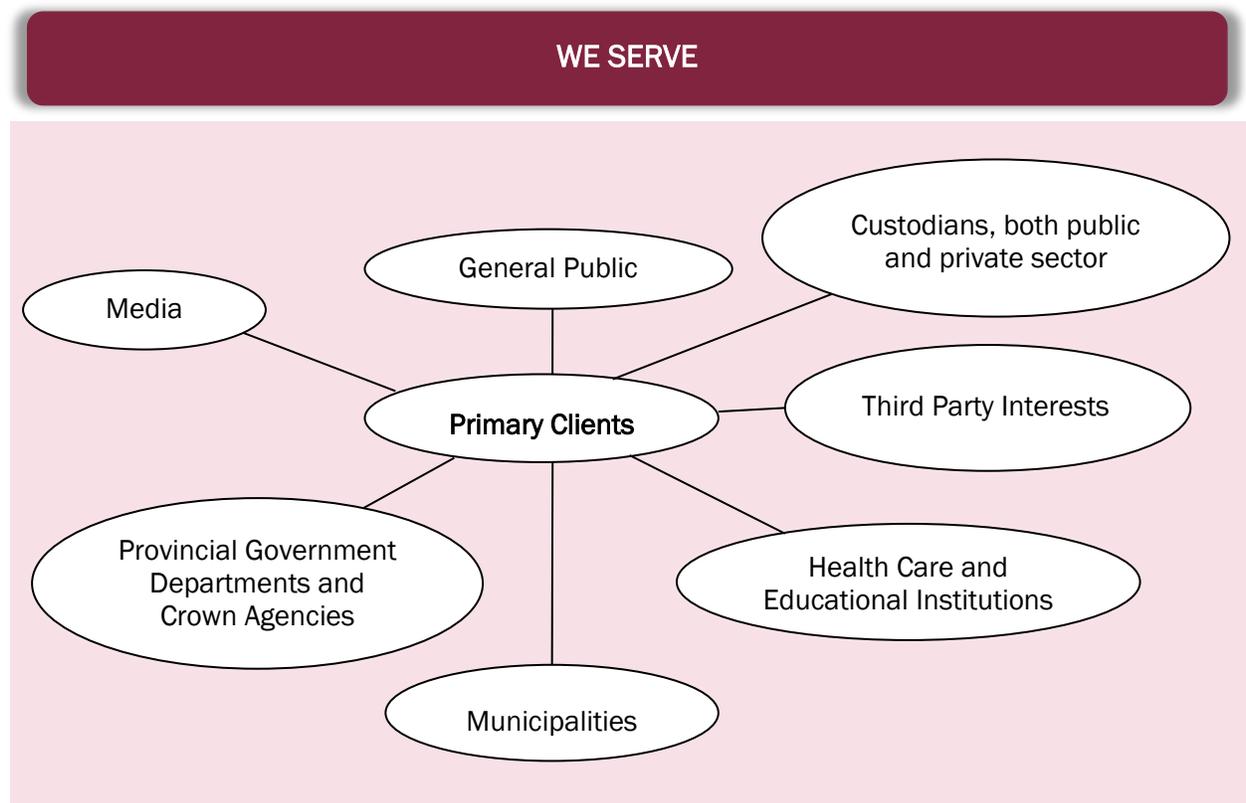
PHIA applies to thousands of custodians, including all health care providers, health care professionals, and other custodians of personal health information, and gives individuals the right to access records of their own personal health information and the right to correct their own personal health information. PHIA provides for protection of privacy by establishing requirements custodians must follow for the collection, use, storage, and disclosure of personal health information.

OUR VALUES

The following values guide OIPC as it upholds its commitment as an independent office.

- Independence** OIPC will conduct investigations independent of any influence.
- Integrity** OIPC will provide accurate, unbiased advice and recommendations.
- Confidentiality** OIPC will adhere to a standard of absolute confidentiality.
- Judgment** OIPC will use professional knowledge and judgment in interpreting policies, practices, and procedures to help ensure compliance with ATIPPA, 2015 and PHIA.
- Respect** OIPC will listen to and consider the ideas and opinions of others, and work collaboratively to achieve results.

WHO WE SERVE



OUR VISION

OIPC'S VISION

Our vision is one where the explicit requirements as well as the values and philosophy underpinning ATIPPA, 2015 and PHIA are upheld through the legislative oversight efforts of this Office, with the goal that all public bodies and custodians subject to these laws operate at the highest level of compliance reasonably possible.

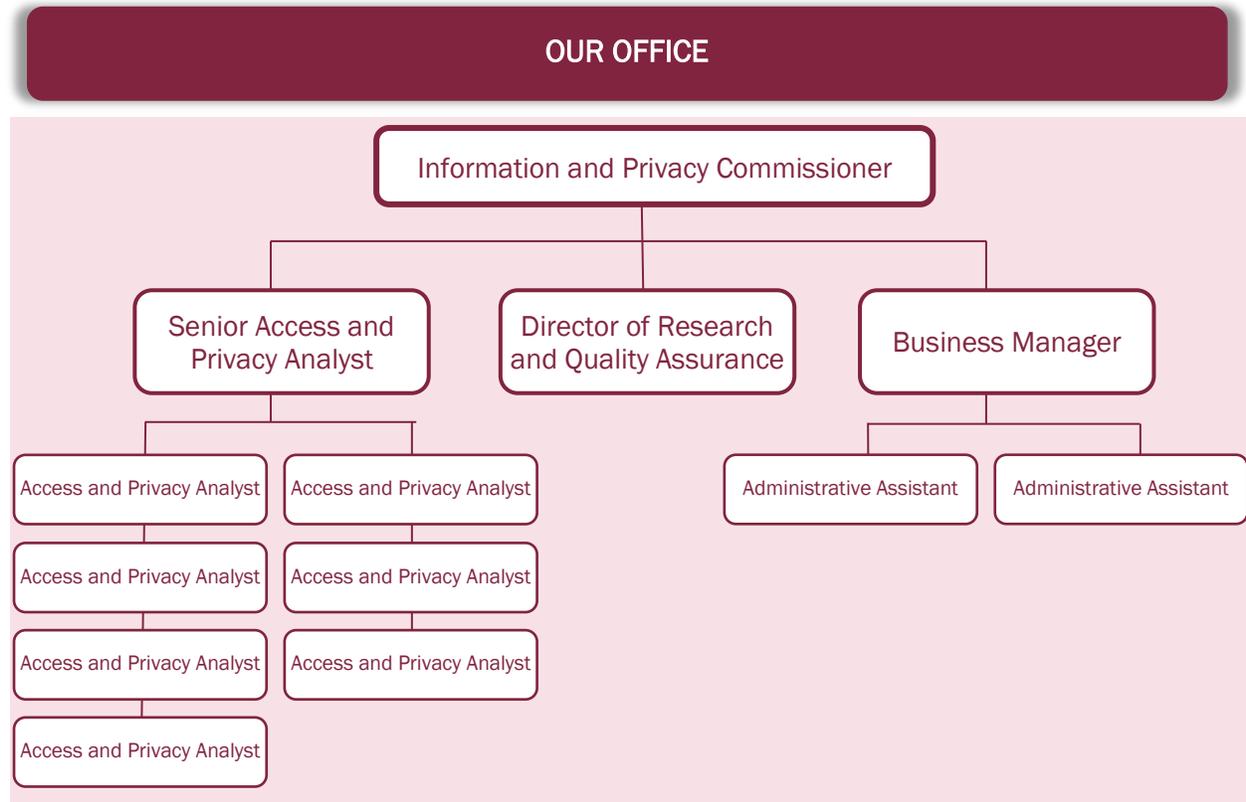
LINES OF BUSINESS

We carry out our mandates under ATIPPA, 2015 and PHIA through two lines of business:

1. Investigations; and
 2. Advocacy and Compliance.
-
1. The Investigations branch handles access to information and privacy complaints, including own motion investigations and investigations that could lead to a charge being laid under the offence provisions of ATIPPA, 2015 or PHIA. This branch also processes requests from public bodies for time extension and disregard applications under ATIPPA, 2015. All publicly issued reports, and detailed information about the complaints process to OIPC are available on our website.
 2. The Advocacy and Compliance branch has responsibility for the following:
 - receiving and reviewing privacy breach reports;
 - conducting audits of public body privacy and access to information practices;
 - consulting and supporting public bodies and custodians who request it;
 - conducting public body and custodian training, public education, and outreach;
 - reviewing privacy impact assessments; and
 - promoting awareness of and compliance with ATIPPA, 2015 and PHIA.

ORGANIZATIONAL STRUCTURE

Our Office is located in the Beothuck Building, 20 Crosbie Place, St. John's, NL and has a staff complement of 13 permanent positions represented by the following organizational chart.



BUDGET AND FINANCIAL STATEMENT

The 2024-2025 budget for OIPC was \$1,546,600. Expenditure and revenue figures included in this document are based on public information provided in the Report on the Program Expenditures and Revenues of the Consolidated Revenue Fund for fiscal year ending March 31, 2025 (unaudited).

	Actual \$	Estimates Amended \$	Original \$
6.1.01. OIPC			
01 Salaries	1,259,389	1,288,200	1,288,200
02. Employee Benefits	6,714	6,800	4,500
03. Transportation & Communications	24,500	35,300	35,300
04. Supplies	9,356	9,500	6,700
05. Professional Services	59,229	62,200	75,000
06. Purchased Services	136,670	137,600	129,900
07. Property, Furnishings & Equipment	6,138	7,000	7,000
02. Revenue – Provincial			
Total: OIPC	<u>1,501,996</u>	<u>1,546,600</u>	<u>1,546,600</u>

Note: Audited financial information will be included in the Annual Report to be tabled by the Speaker during an upcoming sitting of the House. The Office of the Information and Privacy Commissioner does not have a requirement for a separate individual audited statement.

STATISTICS

Our Office tracks a range of statistical information which reflect on our operations, and the information and privacy environment in Newfoundland and Labrador. To view additional statistical information for 2024-2025 please visit our [website](#).

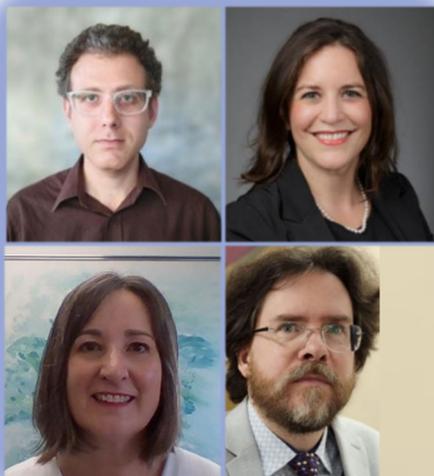
BY THE NUMBERS			
	2024-2025	2023-2024	2022-2023
Access to Information and Protection of Privacy Act, 2015 (ATIPPA, 2015)			
Access Complaints Received	217	236	217
Privacy Complaints Received	23	50	36
Time Extension Applications Received	1,102	820	502
Disregard Applications Received	109	53	57
Breach Notifications Received	162	185	190
Personal Health Information Act (PHIA)			
Access Complaints Received	3	6	7
Privacy Complaints Received	9	16	20
Breach Notifications Received	32	26	26
Advocacy and Compliance			
Guidance Documents*	9	11	3
Education, Training, and Outreach Initiatives	15	31	9
Privacy Impact Assessments (PIAs)	4	2	2

*Includes originals and revisions.

HIGHLIGHTS

RIGHT TO KNOW WEEK 2024 ATLANTIC EVENT

Our Office organized and hosted a virtual panel discussion for this year's Right to Know Week to shine a light on access rights and democracy. The panel discussion took place on September 25, 2024, and included three of Atlantic Canada's access to information oversight offices (Newfoundland and Labrador, Nova Scotia, and Prince Edward Island), as well as a representative from one of the world's leading access to information organizations, the Centre for Law and Democracy. This event was free and open for anyone to attend.



Panelists Starting from Top Left Corner: **Raphael Vagliano**, Legal Officer, Centre for Law and Democracy; **Tricia Ralph**, Information and Privacy Commissioner of Nova Scotia; **Maria MacDonald**, Deputy Information and Privacy Commissioner of Prince Edward Island; and **Sean Murray**, Director of Research and Quality Assurance for OIPC Newfoundland and Labrador.

During Right to Know Week, we also released guidance to assist the general public titled [How to Make an Access Request](#). This guidance is available in both English and French on our website.

Virtual Panel Discussion on Access Rights and Democracy

The event was attended by the general public together with a mix of professionals, including representatives from government departments, other public bodies, private businesses, and regulatory bodies. One hundred and twenty-three attended from all across Canada with one additional attendee from overseas. Panelists were able to shine a light on Right to Know Week by talking about why access rights are foundational to democratic governance while exploring current and pressing challenges to the right of access to information.



APSIM CONFERENCE 2024

The Access, Privacy, Security, and Information Management (APSIM) Conference brings together members of the Newfoundland and Labrador access, privacy, information security, and information management communities to undertake professional development, promote collaboration, and build awareness of the overlap and interplay between these various disciplines.



“Access, Privacy, Security, and Information Management 2024 was truly one of the best conferences I’ve ever attended - and I say this as someone who has participated in nearly a hundred scientific and professional conferences.”

Sule Tomkinson
Professeure agrégée / Associate Professor
Département de science politique
Université Laval

Once again, OIPC chaired the APSIM Planning Committee and invited interested individuals, including custodians, and our province’s public body ATIPP Coordinators, to this two-day event which took place on November 28 and 29, 2024. We are happy to report that the Conference was a big success! The Conference had over 190

registrants, consisted of 19 sessions, and spanned topics such as “Advancing Responsible AI”, “Cyber Threat Landscape”, “Guide to Large Scale Records Digitization”, “In the world of Privacy Regulation, What’s the Constitution got to do with it?” and many more!

APSIM Conference speakers (L-R):

- **Kate Robertson**, Lawyer and Senior Researcher, Citizen Lab, University of Toronto;
- **Katrina Ingram**, Founder & CEO, Ethically Aligned AI; and
- **Sean Murray**, Director of Research and Quality Assurance, OIPC.



#APSIM2024



As part of this year’s APSIM conference, OIPC hosted a half day virtual workshop on November 26, 2024, for our province’s municipalities. This workshop covered strategies to enhance a municipality’s information handling practices, safeguards against cyber threats, and an overview of key privacy principles to consider when using security cameras.



FEDERAL, PROVINCIAL, AND TERRITORIAL JOINT STATEMENTS

Another 2024-2025 highlight took place at the annual meeting of the federal, provincial and territorial (FPT) Information and Privacy Commissioners and Ombudspersons on October 8-10, 2024, in Toronto, Ontario. OIPC joined other FPT Information and Privacy Commissioners and Ombudspersons to sign three important joint resolutions.

Joint Resolution on IPV and Responsible Information - Sharing

1

This resolution, titled **Responsible information - sharing in situations involving intimate partner violence (IPV)**, calls on governments and organizations to develop privacy compliant governance frameworks, including policies and procedures, around the disclosure of personal information in situations where there is a risk of serious harm to life, health, or safety.

FPT

This resolution, titled **Identifying and mitigating harms from privacy-related deceptive design patterns**, calls on individuals and organizations to avoid websites and apps that use deceptive design patterns (dark patterns) to influence, manipulate, or coerce users to make decisions that are not in their best interests.

2

Joint Resolution on Deceptive Design Patterns

This resolution, titled **Transparency by default – Information Regulators Call for a New Standard in Government Service**, calls on governments to take transparency into account in the early stages of designing any new systems, administrative processes, procedures, and governance models and to embed it in their day-to-day operations.

3

Joint Resolution on Government Transparency

All signed joint resolutions are located on our [website](#).

REPORT ON PERFORMANCE

ISSUE 1: IMPROVING BUSINESS PRACTICES

In our 2020-2023 Activity Plan, we set out to take steps to address what were then emerging issues with respect to the COVID-19 public health emergency. Over the past three years, we have taken steps to modernize OIPC's work practices. Over 2023-2026, OIPC will continue this objective of improving business processes and service delivery. As noted above, one of OIPC's lines of business is Investigations. This involves receiving complaints from members of the public under ATIPPA, 2015 and PHIA, investigating those complaints in compliance with the processes and timelines set out in legislation, and producing, where appropriate, public reports and recommendations. The public health emergency from 2020-2023, as well as developments in the areas of access and privacy, required the Investigations branch to adopt new practices that need to be reflected in a formal investigative process. The work of reviewing and updating OIPC's internal policies and procedures for the investigative process has already started and OIPC intends to complete this process and monitor results. Alongside this work, OIPC plans to review and, where necessary, revise other policies and procedures affecting the Advocacy and Compliance branch (which exercises our outreach and education mandate) and the Office as a whole to reflect best practices.

In addition to reviewing OIPC's procedures, OIPC will review public-facing documents that are part of the investigative process, including forms and guidelines for both complainants and public bodies responding to complaint investigations. Our intention for these revisions is to make documents more user-friendly, as well as to ensure they reflect developments in access and privacy under ATIPPA, 2015 and PHIA.

Actual Performance

Objective 2: By March 31, 2025, the Office of the Information and Privacy Commissioner will have continued to review, update, create, implement and monitor current and new policies, procedures and public-facing documents for OIPC.

2024-2025

Indicator

1

Will have updated the remainder of the public facing forms, namely the privacy breach reporting forms used by public bodies and custodians.

Actual Performance

We completed updating the two remaining public-facing forms, namely the Privacy Breach Reporting Forms for public bodies and custodians under ATIPPA, 2015 and PHIA, respectively. Both forms were renamed to Reporting a Privacy Breach

We received internal feedback on our PHIA related forms, identifying a gap in important information needed to ensure OIPC can take steps to investigate custodian related complaints. Based on this feedback, additional updates occurred to the following PHIA forms: Privacy Complaint, Access Complaint, Correction Complaint, and Cost Review.

Indicator

2

Will have continued monitoring effectiveness of new or updated policies and procedures.

Actual Performance

To monitor the effectiveness of the new and updated policies and procedures within our Office, we conducted periodic staff meetings to gather feedback. These meetings provided an opportunity for staff to discuss their experiences and raise any concerns regarding the implementation of the changes. Feedback was collected verbally during these sessions, allowing us to assess the impact of the policies and procedures and allowed us to plan for future adjustments based on staff

input. In addition, we developed an audit checklist to assess the effectiveness of the updated ATIPPA, 2015 Access Investigative Files procedure. This checklist was designed to evaluate key indicators important to the procedure's success. An audit was then conducted using this checklist to systematically review and assess the procedure's performance. The audit results provided valuable insights, enabling us to identify areas for improvement, ensure the procedure was functioning as intended, and to plan for future adjustments as necessary.

Indicator

3

Will have finalized revisions to public-facing forms and guidelines.

Actual Performance

We have completed updates to ATIPPA, 2015 and PHIA Reporting a Privacy Breach forms. As part of this initiative, we also updated the existing ATIPPA, 2015 guidelines providing more details and information to assist public bodies in completing the form. We renamed the updated guidelines How to Complete the Reporting a Privacy Breach Form. Additionally, we developed new guidelines for the PHIA Reporting a Privacy Breach Form, similarly named, to support custodians in properly completing the form. We also reviewed, updated, or created various resources for public bodies and custodians. For the complete list, see our Guidance and Guidelines subsection. All finalized public forms, guidelines, and guidance resources are available on our website.

Discussion of Results

In 2024-2025, we advanced our business practices by monitoring the updates previously made to OIPC's internal policies and procedures, while also completing revisions to the remaining public-facing forms essential to the core operations of our Office. Additionally, we updated and created several public-facing resources to assist our stakeholders; namely, the

public, public bodies, and custodians. In completing these projects, we successfully achieved our ongoing goals of consistency, accuracy, and simplification.

Planning for Next Year

Objective 3: By March 31, 2026, the Office of the Information and Privacy Commissioner will review, update, or create resources, policies or procedures, external or internal, that will improve Office business practices.	2025-2026
Indicators	<ol style="list-style-type: none">1. Will review, update, or create policies or procedures that assist Office business practices.2. Will review, update, or create internal facing resources that assist Office business practices.3. Will review, update, or create public facing resources that assist Office business practices.

ISSUE 2: DIGITAL PRIVACY RIGHTS OF CHILD AND YOUTH STUDENTS

The children and youth of today are growing up within a digital world that continues to evolve and change at a rapid pace. They are more connected and spend more time online; and for many this connectivity extends to their lives within the education system. There is no doubt that digital technologies offer benefits and opportunities for young people to connect, learn and collaborate in new and innovative ways. However, even within an education setting, such digital technologies often come with safety and privacy risks. Our Office has identified the digital privacy rights of students within the education system as an area requiring special attention. To that end, we would like to focus our efforts on identifying, facilitating and supporting opportunities to enhance digital privacy rights, education and protections for child and youth students within the education system.

Actual Performance

Objective 2: By March 31, 2025, the Office of the Information and Privacy Commissioner will have commenced one or more projects, initiatives and/or other mechanisms that facilitate and support opportunities to enhance digital privacy rights, education and protections for child and youth students within the education system.

2024-2025

Indicator

1

Will have continued to communicate with relevant stakeholders.

Actual Performance

On April 17, 2024, we engaged with the Chairs of Education Accord NL, a project focused on developing a strategic approach to transforming and modernizing Newfoundland and Labrador's education system. During this meeting we raised key issues for consideration pertaining to student privacy and the protection of personal information within the educational system. Topics of discussion included the parameters for data collection, the principles of informed consent, the use of school identifiers, as well as the role of surveillance, software, tools, and applications in the educational environment.

Indicator

2

Will have continued to receive input from relevant stakeholders.

Actual Performance

Throughout June and July 2024, we met several times with the Office of the Child and Youth Advocate, during which they shared examples of activities and strategies used to engage with youth organizations and schools. In addition, we had the opportunity to accompany them and observe firsthand how these activities were implemented to effectively engage with the youth and communicate important information.

Indicator

3

Will have commenced planning for one or more projects, initiatives and/or other mechanisms that facilitate and support opportunities to enhance digital privacy rights, education and protections for child and youth students within the education system.

Actual Performance

As part of our Office's Data Privacy Week 2025 initiatives, we engaged with high schools throughout our province, distributing posters designed to raise awareness on student privacy matters. One poster, created by the Office of the Privacy Commissioner of Canada, provided online privacy tips, while the other, developed by the Communications Security Establishment, offered guidance on creating a cyber secure classroom. Additionally, we provided school administrators with a list of online resources related to youth and privacy. We also extended an invitation to answer any questions and offered to arrange presentations on privacy and access to information topics for students or staff.

Discussion of Results

In 2024-2025, we maintained ongoing communication with key stakeholders and continued to receive valuable input. As part of our Data Privacy Week initiative, we engaged with high schools to support the digital privacy rights of students within the education system. The feedback gathered from stakeholders during this period has provided our Office with essential insights, helping to identify options and opportunities to advance the project into its third year.

Planning for Next Year

Objective 3: By March 31, 2026, the Office of the Information and Privacy Commissioner will have commenced one or more projects, initiatives and/or other mechanisms that facilitate and support opportunities to enhance digital privacy rights, education and protections for child and youth students within the education system.

2025-2026

Indicators

1. Will have continued to communicate with other privacy offices.
2. Will have continued to receive input from relevant stakeholders or counterparts at other privacy offices.
3. Will have commenced one or more projects, initiatives and/or other mechanisms that facilitate and support opportunities to enhance digital privacy rights, education and protections for child and youth students within the education system.

ISSUE 3: EMERGING TECHNOLOGIES

We are living through a time when technology is rapidly evolving. Governments, other public bodies, and health care providers are experimenting with new digital technologies in order to improve the services they provide while attempting to manage the risks associated with them. Developments in artificial intelligence, biometrics, and neuroscience technologies, previously thought of as existing only in science fiction, are a practical reality and deserve focus and careful scrutiny, both in terms of individual privacy impacts and broader societal impacts. As with many technologies, there are efficiencies and benefits to be had. However, privacy, security, and ethical considerations and protections need to keep pace. As an oversight agency, our Office needs to be in a position to better understand these emerging technologies

and with internal education and training, we plan to be in a better position to caution, champion, and advocate for privacy, security, and ethical safeguards that aim to protect against the risks previous generations have only dreamed of.

Actual Performance

Objective 2: By March 31, 2024, the Office of the Information and Privacy Commissioner will have continued to identify and implement internal education and training opportunities relating to new emerging technologies, and continued and enhanced advocacy and public education initiatives, as appropriate.

2024-2025

Indicator

1

Will have continued to identify emerging technologies.

Actual Performance

We continued to identify a number of emerging technologies that we want to better understand through informal and formal training, including privacy enhancing technologies (PETs), artificial intelligence and machine learning, cyber security, and data scraping. Alongside this, our Office also signed the joint resolution with other commissioners across Canada titled Identifying and Mitigating Harms from Privacy-Related Deceptive Design Patterns.

Indicator

2

Will have continued to identify education and training opportunities related to emerging technologies.

Actual Performance

We identified both virtual and in-person education and training opportunities in the form of presentations and expert panel discussions. Many of these education and training opportunities came from the International Association for Privacy Professionals, Office of the Chief Information Officer, federal-provincial-territorial partnerships, or were initiated by our Office. Additionally, the Access, Privacy, Security, and

Information Management (APSIM) Conference, that our Office chaired, offered a number of in-person training opportunities.

Indicator

3

Will have continued education and training related to emerging technologies.

Actual Performance

We continued obtaining education and training for emerging technologies by our staff attending a variety of online or in-person presentations and panel discussions on topics such as: Jurisprudence – Privacy and Access related Court Cases in 2024; Recent Developments in the Use of AI and how it relates to Investigations; Recent Cybersecurity Breaches; AI Governance Frameworks; Busting Myths about Privacy and Cyber Security; The Power of PETs: Privacy Enhancing Technologies; Top of Mind Panel Discussion on Data Privacy; Advancing Responsible AI; Cyber Security Office Presentation; Cyber Threat Landscape; The Value of Privacy by Design: Reaping Rewards by Considering Privacy from the Start; Cyber Insurance Landscape; The Sociotechnical Approach to AI: Bridging Theory and Governance; Protecting the Fundamental Right to Privacy in the Digital Age: An Overview of the Office of the Privacy Commissioner of Canada’s Activities Over the Past Year; Municipal Workshop session on Cybersecurity; Youth and Privacy: A Legal Lens on Protecting the Privacy of Youth in Nova Scotia; AI and Privacy: Bridging the Gap between Progress and Protection; and Data Governance Approaches to Mitigating AI Risk.

Discussion of Results

In 2024-2025, we successfully continued our identification of key emerging technologies and training opportunities, and we continued internal education and training. We are committed to continuing our efforts to provide guidance, education, and oversight on matters related to access to information and protection of privacy in this evolving field.

Planning for Next Year

Objective 3: By March 31, 2026, the Office of the Information and Privacy Commissioner will have continued to identify and implement internal education and training opportunities relating to new emerging technologies, and continued and enhanced advocacy and public education initiatives, as appropriate.

2025-2026

Indicators

1. Will have continued to identify emerging technologies.
2. Will have continued to identify education and training opportunities related to emerging technologies.
3. Will have continued education and training related to emerging technologies.

ADVOCACY AND COMPLIANCE

EDUCATION, TRAINING, AND OUTREACH

OIPC’s Advocacy and Compliance branch spearheaded many initiatives aimed at education, training, and outreach throughout the 2024-2025 fiscal year. Here are some of our engagement highlights for each quarter.

May 3rd: Our Above Board Newsletter was distributed to public body coordinators, featuring a recent court decision in our province regarding vexatious litigants.

May 13th: The release date of College Connection Podcast episode featuring Commissioner Harvey discussing health information, privacy, and PHIA.

May 29th: Our Safeguard Newsletter was circulated to custodian organizations, spotlighting the 2023 PHIA Review Final Report recently released to the public.



Q1

The College Connection Podcast is presented by the College of Registered Nurses

Q2



...the Court found that Canadians have a reasonable expectation of privacy in their IP address.

Oct 8th-10th: Our Director of Research and Quality Assurance participated in the Federal, Provincial and Territorial Information and Privacy Commissioners and Ombudspersons annual meeting.

Oct. 9th: We provided virtual training to two custodian organizations offering an overview of PHIA to their members.

Nov. 1st: Our Above Board Newsletter was circulated to public body coordinators, highlighting our Municipal Matters Guidance.

Nov. 7th-8th: Our Director of Research and Quality Assurance attended and participated in the Regulator’s Panel at the Canadian Bar Association’s Access and Privacy Law Conference.

Nov. 28th-29th: We presented at the APSIM Conference on topics of Privacy by Design, OIPC Investigations and Reports, and moderated a panel on the Role of Journalism in Transparency and Accountability of Public Bodies.

Dec. 13th: Our Safeguard Newsletter was circulated to custodian organizations highlighting the recently released Joint Investigation Report of the LifeLabs Data Breach.

Aug. 5th: Our Above Board Newsletter was sent to public body coordinators, highlighting the privacy implications of the recent Supreme Court of Canada decision R. v. Bykovets.

Aug. 23rd: We provided virtual training to a town’s municipal enforcement officer offering an overview of ATIPPA, 2015.

Sept. 25th: Our Office hosted and participated in a virtual panel discussion in celebration of Right to Know Week.

Q3



Jan. 27th: Our Above Board Newsletter was sent to public body coordinators and highlighted the FPT Joint Resolutions.

Jan. 27th-31st: During Data Privacy Week, we distributed posters to high schools to raise awareness about the importance of safeguarding personal data. Our awareness activities also extended to our province’s public bodies and custodians where we shared with them valuable cyber security resources and tools developed by the Canadian Centre for Cyber Security.

Q4



If a custodian has not transferred custody and control of their records of PHI to another custodian, then they remain responsible for complying with PHIA, **EVEN** if they have closed their practice, retired or left the province.

Mar. 4th: Our Safeguard Newsletter circulated to custodian organizations offered reminders for when transferring medical records.

PRIVACY IMPACT ASSESSMENT REVIEW

Privacy impact assessments (PIAs) and preliminary privacy impact assessments (PPIAs) help identify and address potential privacy risks that may occur in a project. ATIPPA, 2015 requires departments and the executive branch of the provincial government to complete a PIA or PPIA during the development of a program or service. If the program or service under development is a common or integrated program or service, the minister must notify OIPC regarding this program at an early stage of development and it must submit the PIA to OIPC for the Commissioner's review and comments. In addition to those PIAs required by statute to be submitted to us, OIPC is also happy to review and provide feedback on PIAs submitted voluntarily. This is a valuable opportunity for public bodies to access expert advice early in their planning processes and we encourage them to accept this invitation.

What is a common or integrated program or service?

A common or integrated program or service provides one or more services through:

- a public body and one or more other public bodies working collaboratively; or
- one public body working on behalf of one or more other public bodies.

In 2024-2025, OIPC received one PIA related to a common or integrated program or service pursuant to ATIPPA, 2015, and three voluntarily submitted PIAs related to PHIA.

On April 5, 2021, the Department of Education provided early notification of a common or integrated program called Coordinating Supports for Children and Youth. The draft PIA for this program was delivered to OIPC on July 23, 2024. The program involves partners including the Departments of Health and Community Services; Children, Seniors, and Social Development; Justice and Public Safety; and Education; as well as Newfoundland and Labrador Health Services and Conseil Scolaire Francophone Provincial.

The Department of Health and Community Services shared two PIAs, both on changes to the system that supports the Newfoundland and Labrador Prescription Drug Program (NLPDP). The Royal Newfoundland Constabulary also shared a PIA under PHIA.

GUIDANCE AND GUIDELINES

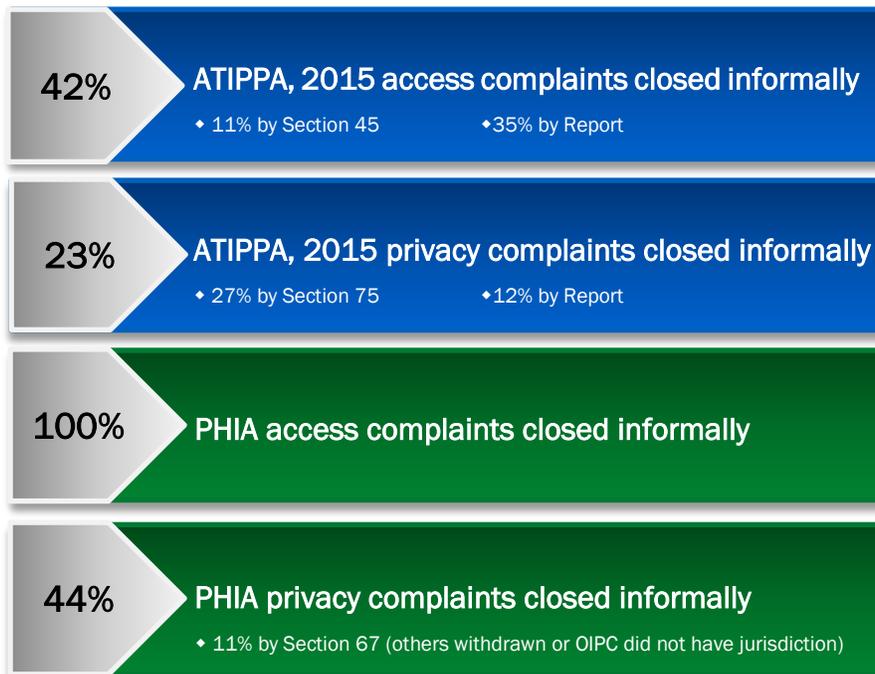
Our resource documents, available on our website, offer valuable information and useful analysis on topics of interest or concern for the public, public bodies, and custodians. These resources help individuals understand their rights of access to information and protection of privacy. These tools also assist public bodies and custodians who are required to respond to requests and make decisions in accordance with the law. In 2024-2025 our Office released the following new or updated resources:

ATIPPA, 2015 Guidance and Guidelines	PHIA Guidance and Guidelines
<p>For the Public/Complainants:</p> <ul style="list-style-type: none">• How to Make an Access Request/Comment présenter une demande d'accès – Updated! <p>For Public Bodies:</p> <ul style="list-style-type: none">• Municipal Matters: Designating the Head – Updated!• Municipal Matters: Tips for Councillors – Updated!• Municipal Matters: Privacy Breaches – Updated!• How to Complete the Reporting a Privacy Breach Form – Updated!• PIAs: What is Personal Health Information?	<p>For Custodians:</p> <ul style="list-style-type: none">• How to Complete the Reporting a Privacy Breach Form – NEW! <p>ATIPPA, 2015 and PHIA Guidance</p> <p>For Public Bodies and Custodians:</p> <ul style="list-style-type: none">• Use of Video Surveillance – NEW!• Privacy Management Program – Updated!

INVESTIGATIONS

INFORMAL RESOLUTIONS

ATIPPA, 2015 and PHIA allow OIPC to work with the public who filed complaints, together with public bodies, and custodians, to resolve complaints informally where possible and appropriate to do so. While a large number of complaints are concluded through issuance of a Commissioner's Report, OIPC resolves many complaints informally. In 2024-2025 OIPC resolved many complaint files through informal resolution.



Informal resolutions mediated by OIPC access and privacy analysts can include, for example:

- the public body releasing further information;
- the public body conducting a new search for responsive records;
- the complainant being satisfied following a review by OIPC that information has been properly withheld;
- the public body rectifying a deemed refusal complaint by providing a response to the access request during OIPC investigation;

- the public body or custodian acknowledging a privacy breach and agreeing to develop improved policies and practices for properly handling personal information or personal health information; and
- the public body or custodian explaining to the complainant its authorization to collect, use, or disclose personal information or personal health information.

REPORTS

In 2024-2025, this Office issued 65 access reports that closed 78 investigation files (58 reports closed one file each, three reports closed two files each; three reports closed three files, and one report closed five files) and two privacy reports that each closed one privacy investigation under ATIPPA, 2015. There were no access reports or privacy reports under PHIA.

Section 16 – Deemed Refusal

If a public body fails to respond to a request within 20 business days as required by ATIPPA, 2015 or an extended time period as approved by OIPC, the public body is deemed to have refused access to the request, and the applicant can file a complaint. In 2024-2025 we received several deemed refusal complaints and issued 10 reports on this topic.

Reports A-2024-015, A-2024-027, A-2024-031, A-2024-036, A-2024-038, A-2024-041, and A-2024-046

Continuing a trend from 2023-2024, this Office received several complaints during the reporting period about the Department of Justice and Public Safety failing to respond to access to information requests on time and issued seven reports which covered nine such complaints.

One report we would like to highlight was Report A-2024-036 where, due to a delay in the Department processing a request and searching for records, the responsive records were destroyed. This illustrates the importance of ensuring timely processing of access requests.

Across these reports, the Commissioner recommended that the Department review its policies and procedures, apply for time extensions where appropriate, and assign additional resources where necessary. Since the fall of 2024, the Department has applied for time extensions and

improved its processes, and we have not received further deemed refusal complaints since that time.

Section 13 – Reasonable Search

The duty to assist at section 13 consists of three parts: assisting an applicant with making a request, conducting a reasonable search for records, and responding to an applicant in an open, accurate and complete manner. Most duty to assist complaints revolve around the question of whether the public body conducted a reasonable search. A reasonable search is one in which an employee, experienced in the subject matter, expends a reasonable effort to locate records which are reasonably related to the request. The standard is reasonableness, and it is not a standard of perfection. This means that public bodies might meet the standard even if it has not found every single record during a search. In some cases, a Complainant may be required to provide some compelling evidence to support their assertion that a public body has failed to conduct a reasonable search.

Report A-2025-037 – Department of Justice and Public Safety

The Complainant asserted on a “balance of probabilities” that additional records existed beyond what the Department had located in its search. The search efforts of the Department were reviewed during our investigation and found to be reasonable. In the absence of any proof for the Complainant’s assertion, the Commissioner concluded the Department had conducted a reasonable search for records.

Report A-2025-020 – City of St. John’s

The Complainant asserted additional records existed and claimed knowledge of emails and other records that had not been located by the City. In the absence of any proof from the Complainant of these additional records, weighed against the details provided by the City of its search (including search terms used to search its records), the Commissioner concluded the City had conducted a reasonable search.

Section 30 – Legal Advice

Section 30 is a discretionary exception to access that allows a public body to withhold information that is subject to solicitor-client or litigation privilege.

Records that are often of interest through access to information requests include legal invoices or information about the settlement of litigation, as they engage the interest in transparency about the expenditure of public funds.

Report A-2024-033 – City of St. John’s

In this request for legal fees related to an application for a declaration brought by the City, the Commissioner concluded that, even though the litigation had concluded, because the fees related to a specific legal matter and a single, identifiable client (the City), the presumption that solicitor-client privilege attached had not been rebutted.

Report A-2024-045 – Department of Justice and Public Safety

This Report involved a request for expenses connected with several prosecutions which had concluded. In contrast to A-2024-033, the Commissioner found the specific factors involved in this matter, including that there were multiple proceedings, rebutted the presumption of solicitor-client privilege and recommended the information be disclosed.

Section 7 - Conflict with Other Acts

ATIPPA, 2015 is considered to be a complete code for the handling of access to information requests. However, in some circumstances the Act will interact with other legislation which may or may not prevail over it. The statutory provisions listed in Schedule A of ATIPPA, 2015 often come into play in these determinations.

Report A-2024-028 – Royal Newfoundland Constabulary

This complaint involved the decision by the Royal Newfoundland Constabulary to withhold a vehicle collision report, a document accessible under a process provided at section 174 of the **Highway Traffic Act**. The Commissioner concluded the **Highway Traffic Act** only prevails over ATIPPA, 2015 to the extent ATIPPA, 2015 may require the information in a vehicle collision report to be withheld and recommended the disclosure of the vehicle collision report.

Report A-2024-029 – Memorial University

Section 30 of the **Auditor General Act, 2021** states ATIPPA, 2015 does not apply to audit working papers. The Commissioner concluded this removed all records related to the drafting, planning, investigation, and execution of the Auditor General’s audit and report from the application of ATIPPA, 2015. The Commissioner further concluded that it was irrelevant

whether the audit and report had been completed, as the protection for audit working papers still applies.

Reports A-2024-053 and A-2025-015 – Memorial University

The University asserted that United Kingdom legislation, in particular the **UK General Data Protection Regulations** and the **Data Protection Act, 2018** prevented the disclosure of an employment contract for an employee located at its UK campus. The Commissioner concluded the contract was in the custody or control of the University and only ATIPPA, 2015 could apply.

Late Application of Exceptions

Generally, in an access complaint, a public body can only rely on those exceptions to access it originally cited in its final response to the applicant as those are the exceptions the applicant was made aware of and on which their complaint is based. However, in some circumstances, a public body has sought to apply to new exceptions or rely on a different exception than that originally applied.

Report A-2024-025 – Memorial University

The Commissioner noted the distinction between discretionary and mandatory exceptions and allowed the University to apply section 40 to information originally withheld under section 29.

Report A-2024-032 – City of St. John's

The Commissioner allowed the City to raise section 37 (disclosure harmful to individual or public safety) even though it is a discretionary exception. However, the Commissioner concluded the City had not met the burden of proving it applied.

Report A-2024-044 – Department of Fisheries, Forestry and Agriculture

The Commissioner allowed the Department to raise section 36 (disclosure harmful to conservation). The exception was raised early enough in the investigation to allow the Complainant an opportunity to respond. The Commissioner concluded the exception did apply.

Report A-2024-056 – Department of Justice and Public Safety

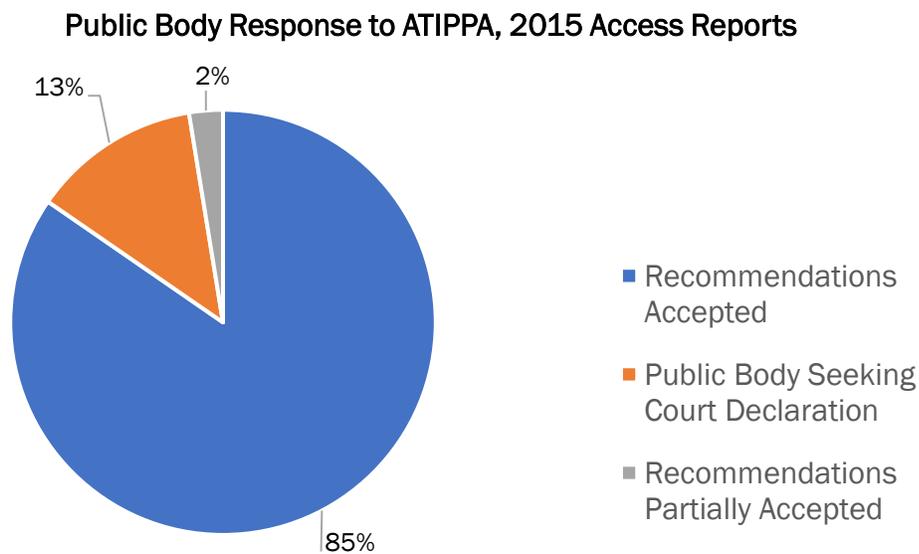
The Department raised section 5 (application) late in our investigation. As section 5 is a question of jurisdiction, it, like a mandatory exception, must always be considered. The

Commissioner concluded section 5 did apply to remove the records from the application of ATIPPA, 2015.

COMPLIANCE

As noted above, this Office issued 67 reports in 2024-2025 (65 ATIPPA, 2015 access, 2 ATIPPA, 2015 privacy, and no reports under PHIA). Public bodies and custodians in receipt of a report from OIPC are required to respond within ten business days under ATIPPA, 2015 and 15 days under PHIA and indicate whether they accept the recommendations contained in a report.

The below chart illustrates how public bodies have responded to recommendations from this Office.



Of the two ATIPPA, 2015 privacy reports, OIPC did not have recommendations for the public body in one, and our recommendations in the other report were accepted.

OIPC monitors public body and custodian compliance with its recommendations and may, where appropriate, rely on its order-making powers under sections 51 and 80 of ATIPPA, 2015 to enforce compliance of accepted recommendations.

DISREGARD AND TIME EXTENSION APPLICATIONS

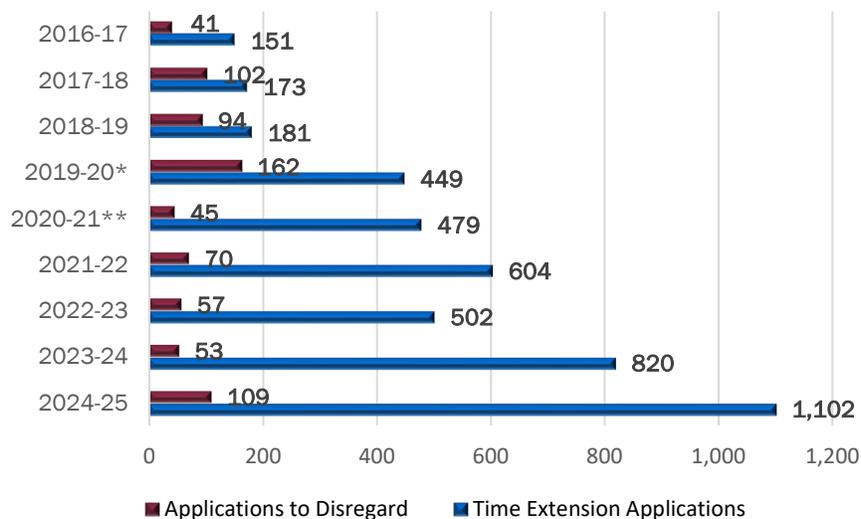
Under sections 21 (disregarding a request) and 23 (extension of time limit) of ATIPPA, 2015, public bodies may apply to this Office for approval to disregard an access to information request or approval of an extension of time to respond to an access to information request. These provisions recognize that some access requests may involve substantially more work than others and can assist public bodies in managing their workload. Section 21 further recognizes that not all access requests may be reasonable and public bodies should not be expected to expend time and resources answering requests that are repetitive, frivolous, excessively broad, or otherwise in bad faith. As highlighted in the “Reports” section of this Annual Report, OIPC has received an increasing number of deemed refusal complaints. Rather than simply failing to meet the statutory deadline to issue a response to requesters, those public bodies which find themselves answering complex and large access to information requests should consider the time extension provisions of ATIPPA, 2015.

In 2024-2025, public bodies made 1,102 applications for extensions of time for 721 unique access to information requests (where appropriate, this Office will consider multiple applications for the same access to information request). Also in this year, public bodies made 109 applications for approval to disregard access to information requests. Both these numbers represent significant increases since last year, with time extensions applications up 34.4% and disregard applications up by 105.7%.

Of the 1,102 time extension applications, 987 (89.6%) were approved, 83 (7.5%) partially approved, 11 (1%) denied, and the remaining 21 (1.9%) were withdrawn by the public body. In total, across 1,081 applications (discounting those that were withdrawn), this Office approved 93.9% of additional time requested by public bodies (22,030 days approved out of 23,467 days requested).

This Office may approve a public body’s application to disregard an applicant’s request for information. The consequence of this approval means the applicant does not get to make their access request; however, they may file an appeal in Court of the public body’s decision to disregard the request. Although there is recourse, the Court process can be time consuming

and costly. Given these consequences, a higher threshold for a disregard application applies. Of the 109 disregard applications, 78 (72%) were approved, 12 (11%) partially approved, and 15 (14%) denied.



* 2019-20 Time Extension Applications -110 during the State of Emergency; 100 during COVID-19 lockdown; and 239 Normal Requests.

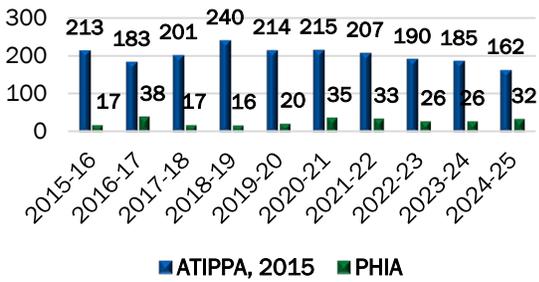
** 2020-21 Time Extension Applications - 218 during COVID-19 lockdown and 261 Normal Requests.

BREACH REPORTING

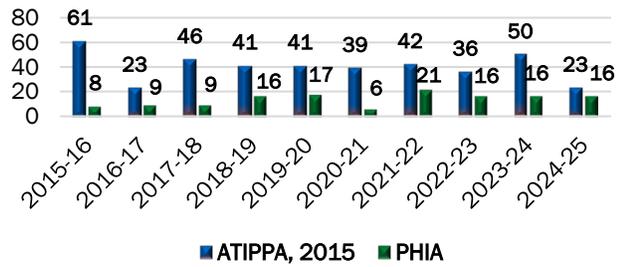
Under both ATIPPA, 2015 and PHIA, public bodies and custodians are required to maintain the security of personal information and personal health information in their custody or control. Further, ATIPPA, 2015 and PHIA require public bodies and custodians to inform OIPC in the event that personal information or personal health information has been improperly accessed, disclosed, stolen, lost, or disposed of. In the case of ATIPPA, 2015, public bodies must report every breach, while under PHIA, custodians must only report a material breach as defined in the regulations.

In 2024-2025, public bodies reported 162 breaches to this Office under ATIPPA, 2015. In the same period, custodians reported 32 breaches under PHIA. These figures represent a modest decrease from the 185 breaches reported under ATIPPA, 2015 while there was an increase from the 26 breaches reported under PHIA in 2023-2024.

Reported Privacy Breaches



Privacy Complaints Received



Of the breaches reported to this Office under ATIPPA, 2015, the majority (61%) continue to involve personal information being sent to the wrong person through email.

The breach reporting provisions of ATIPPA, 2015 and PHIA provide OIPC with an opportunity to engage with public bodies and custodians to provide guidance on containing and mitigating privacy breaches. In addition to reporting privacy breaches to OIPC, both ATIPPA, 2015 and PHIA also provide for public bodies and custodians to notify those individuals affected by a privacy breach.

COURT MATTERS

At any given time, a number of matters relating to the mandate of OIPC are working their way through the courts. The vast majority of these, and in the case of this particular reporting period, all of them, tend to relate to access to information matters under ATIPPA, 2015. Occasionally OIPC may be the appellant or respondent in these matters, but most commonly we are an intervener, given that the Commissioner has a statutory right to intervene in such matters.

The Commissioner and our staff work with ATIPPA, 2015 every day and as the independent oversight body we have expertise and practical experience to share with the court as to interpretation of the statutory provisions. While this sometimes means the arguments we put forward in court will appear to align with those of the access to information applicant, on other occasions our submissions are more consistent with those of the public body or third party. Sometimes we may take a different perspective than any other party before the court.

Regardless of the specific details of each case, our goal is to be a friend of the court, to assist in bringing about a result that best reflects a purposive interpretation of the statute.

We refer to court matters by the court file numbers as issued by the Supreme Court of Newfoundland and Labrador, General Division or Court of Appeal for Newfoundland and Labrador, as applicable, and where there are court decisions, by the decision citation number as well.

Ongoing Court Matters

Department of Transportation and Infrastructure, 2020 01G 6069;
Department of Fisheries, Forestry and Agriculture, 2021 01G 0966;
Department of Transportation and Infrastructure, 2021 01G 5446;
Office of Women and Gender Equality, 2022 01G 2003;
Office of Women and Gender Equality, 2022 01G 4144;
Department of Justice and Public Safety, 2022 01G 2004;
Department of Justice and Public Safety, 2023 01G 1307; and
Treasury Board Secretariat, 2023 01G 1416.

The above-noted matters are all applications seeking a declaration of the Court pursuant to section 50 of ATIPPA, 2015 that the Public Body does not have to comply with the recommendations in a Commissioner's Report. The complaints that resulted in these Reports involved requests by access to information applicants which were refused by the Public Body on the basis of a claim of solicitor-client privilege. During the course of each of these OIPC investigations, the Public Body refused to provide a copy of the unredacted records to the Commissioner for review. The Commissioner deemed insufficient evidence was provided to verify the claims. Following the Court of Appeal ruling in **OIPC v. Department of Justice and Public Safety**, 2023 NLCA 27(CanLII), pertaining to court matter 2022 01H 0023, we accept that OIPC does not have the authority to compel production of such records under the current statutory language used in ATIPPA, 2015.

Nevertheless, the public body bears the burden of proof per section 43 of the Act, and how a public body can meet the burden of proof for the solicitor-client exception will vary depending on the facts of each matter. In each of these cases, the Public Bodies did not provide sufficient evidence, or in some cases any evidence at all, to discharge their burden of proof. The Commissioner therefore recommended disclosure of the responsive records. It will be up to

the Court in hearing these declaration applications to determine what constitutes sufficient evidence to discharge the Public Body's burden of proof. These matters are now beginning to move forward. In February 2024, an application to consolidate both matters involving the Office of Women and Gender Equality was approved, and the matter was heard on February 11, 2025. A decision is anticipated in the upcoming reporting period.

**Oleynik v. Memorial University, Various Court Files;
Oleynik v. Legal Appointments Board, 2022 01G 5032; and
Oleynik v. Independent Appointments Commission, 2023 01G 1907.**

The Applicant and Memorial University have a number of matters before the Court relating to decisions by Memorial in response to his access to information requests. These matters were on hold pending the outcome of a vexatious litigant application by Memorial University involving the Complainant, which was heard by the Court and reported on in last year's Annual Report (**Memorial University of Newfoundland v. Oleynik**, 2024 NLSC 42 (CanLII), pertaining to court matter 2021 01G 4960). The Applicant has appealed that decision to the Court of Appeal, however, so the other matters remain on hold pending the outcome of that appeal. This has also had the effect of other matters involving the same Applicant (noted above) being held in abeyance until the outcome of that appeal.

In its ruling declaring the Applicant to be a vexatious litigant, the Court imposed a Vexatious Litigant Order requiring the Respondent to obtain leave before continuing with any ongoing proceeding or initiating any new proceeding, however, the Order does not restrain the Applicant from commencing proceedings in the Court of Appeal. The Applicant's appeal was heard on September 24, 2024. No decision was rendered by the conclusion of this reporting period.

Braya Renewable Fuels and NARL Logistics Limited Partnership v. Department of Industry, Energy, and Technology, 2022 01G 1628

This is an appeal by two Third Party companies of a decision by the Department of Industry, Energy, and Technology to comply with recommendations in Commissioner's Report A-2022-006 to release the majority of information within a memorandum of understanding. The appeal objects to the release of the information, arguing that the information in question is

required to be withheld from the Applicant in accordance with section 39 of ATIPPA, 2015. The matter was resolved when the appellants filed a notice of discontinuance on May 1, 2024.

**Lorraine Barbe v. Conseil Scolaire Francophone Provincial, 2023 01G 1176; and
Lorraine Barbe v. Royal Newfoundland Constabulary, 2023 01G 2446.**

These are two appeals filed by the same Applicant. The first is a direct appeal of a decision by Conseil Scolaire Francophone Provincial about an access to information request. The other matter is an appeal filed by the Applicant following a decision by the Royal Newfoundland Constabulary (RNC) to comply with the recommendations in Commissioner's Report A-2023-022. In that Report the Commissioner had agreed with the RNC's determination that the records requested by the Applicant fell under section 5(1)(m) and were therefore not subject to ATIPPA, 2015. These matters were consolidated by the Court on August 5, 2024, with agreement of the parties. A hearing date has not yet been set.

Ariana Kelland and Canadian Broadcasting Corporation v. Royal Newfoundland Constabulary, 2023 01G 4873

This is a direct appeal of a decision by the Royal Newfoundland Constabulary (RNC) denying a request for records about disciplinary complaints, hearings, and decisions. The appeal argues that the RNC was over-broad in withholding information on the basis of section 40(1), that section 33(2), the workplace investigations exception, does not apply, and furthermore that section 33(2) is unconstitutional. A date has not yet been set for the Court to hear this matter.

Arts NL v. OIPC, 2023 01G 5365

This is an application by Arts NL seeking a declaration of the Court pursuant to section 50 of ATIPPA, 2015 that it need not comply with the Commissioner's recommendations in Report A-2023-042. The complaint that resulted in that Report related to a decision by Arts NL to withhold information from the Applicant, citing sections 32 (confidential evaluations) and 40 (personal privacy). The Applicant had been seeking the names of peer assessors in each grant category for the spring and fall granting sessions of 2022. The Commissioner found that Arts NL had not established that the exceptions apply. The matter was heard on November 22, 2024, and a decision is pending.

City of Corner Brook v. OIPC, 2024 04G 0207

The requester in this matter had sought access to information about several properties within the City of Corner Brook. The City released a large number of records, but withheld some information based on several exceptions, including 28(1), 29(1), 31(1), and 39(1). The requester asked the Commissioner for review of the City's response to the request. In Report A-2024-039 the Commissioner found instances where the exceptions claimed by the City were not applicable, so some additional information was recommended for disclosure. The City of Corner Brook has applied for a declaration that it need not follow the Commissioner's recommendations. A hearing set for March 26, 2025, was cancelled by the Court due to unforeseen circumstances and it has not yet been rescheduled.

Royal Newfoundland Constabulary v. OIPC, 2025 01G 380; and Royal Newfoundland Constabulary v. OIPC, 2025 01G 890

These matters stem from access to information requests that subsequently were the subject of Commissioner's Reports A-2024-055 and A-2025-001. In each case, the RNC relied on section 5(1)(m) to withhold the records, and also section 40(4) for the matter addressed in Report A-2025-001. In both cases, the Commissioner found that the RNC had not met the burden of proving that the information should be withheld from the requester, and therefore recommended disclosure. The RNC has applied for a declaration that it need not follow the Commissioner's recommendations. These matters have been consolidated, and a hearing is scheduled for September 19, 2025.

Kenneth Dicks v. Department of Health and Community Services, 2024 01G

This is a direct appeal by the Applicant of a decision by the Department of Health and Community Services to refuse access to some of the information he requested, relying on section 35(1)(d), 39(1)(a)(ii), 39(1)(b), 39(1)(c)(iii), and 40(1). ATIPPA, 2015 gives requesters a right to bring refusals of access directly to court without first going to the Commissioner for a review, which is not commonly done, but was done in this instance. As with all of the other matters set out here, the Commissioner will be a party to the matter, as intervenor. A hearing date has been set for January 16, 2026.

Court Decisions and Other Concluded Matters

Memorial University of Newfoundland v. OIPC, 2024 01G 0937

Memorial University applied for a declaration of the Court pursuant to section 50 of ATIPPA, 2015 that it need not comply with the Commissioner's recommendations in Report A-2024-006. The Applicant had sought information relating to vehicle allowances, bonuses, and special payments to senior officials of C-Core, Genesis, and the Canadian Centre for Fisheries Innovation. Memorial denied the request, taking the position that records of those entities are not within its control or custody. The Commissioner determined otherwise and recommended that Memorial conduct a search and provide a new response to the Applicant.

The matter was heard on January 16, 2025, and a decision was rendered on February 6, 2025. The Court considered the roles of C-Core and Genesis and the nature of their relationship with Memorial, and ultimately determined that the information regarding C-Core and Genesis was not within the control or custody of Memorial. The Court found that there was insufficient evidence provided by Memorial regarding the Canadian Centre for Fisheries Innovation to discharge its burden of proof, and therefore Memorial was ordered to conduct a reasonable search for records relating to that organization.

CONCLUSION

The fiscal year 2024-2025 was a significant year of change at OIPC. Commissioner Harvey completed his tenure in May and there were two periods with an interim Commissioner until Commissioner Hatfield was appointed in December 2025. Every staff member should be commended for their efforts to ensure all OIPC's legislative duties and commitments in 2024-2025 were met and exceeded expectations. The event planning and coordinating of the APSIM conference is an excellent example of the hard work and effort shown by staff to educate, advocate and have an in-person dialogue with experts in this province in privacy, access, security, and information management. APSIM was a huge success with positive feedback received from those who attended.

The Office keeps significant data on our work with public bodies, custodians and complainants and has consistently shown a growth in most areas of OIPC's mandate. One area that has

shown significant growth in requests for disregards and extensions of time for ATIPP requests. Public bodies are still struggling to meet legislative timelines and are appropriately requesting more time to adequately conduct searches, apply appropriate redactions and provide responses to an applicant. This led to significant growth of this work at OIPC over the past year.

This Annual Report outlines the data that supports the demand and growth that has continued over successive years at OIPC, and we encourage an in-depth review into those sections of the Report. Citizens in Newfoundland and Labrador are familiar with their access and privacy rights under our legislation, which shows an engagement that the province should be proud to support. While access to information laws have been criticized and maligned in other provinces, Newfoundland and Labrador can boast of success under PHIA and ATIPPA, 2015. Transparency should be the norm. This principle has become more essential than ever as our democratic institutions come under fire from misinformation and cynicism, and distrust in public body decision-making. Newfoundland and Labrador is well-positioned to ensure continued transparency and protection of privacy.

There is a constant tension between the desire for privacy and other societal values such as security, convenience and efficiency. The rapid pace of artificial intelligence has left behind the development of clear ethical guidelines and laws respecting its usage. Governments play a crucial role in shaping the access to information and privacy landscape in Canada and their actions can either promote or undermine individual rights. It is OIPC's goal to work collaboratively to ensure this province continues to have the most progressive and transparent laws in Canada.

Appendix A

**Means of Resolution Explanations for
Access and Privacy Investigative Files under
the Access to Information and Protection of Privacy Act, 2015**

Means of Resolution (ATIPPA, 2015 Access) Explanations

No Jurisdiction	Based on the preliminary information gathered, it was determined that ATIPPA, 2015 did not apply to the organization or activity that was the subject of the Complaint.
Declined to Investigate	Based on the preliminary information gathered, it was determined that the Commissioner declined to commence an investigation because the Complaint was not filed within a reasonable period, as set out in section 42 of ATIPPA, 2015 or was filed prematurely.
Withdrawn	The Complainant no longer wishes to pursue the matter.
Informal Resolution	OIPC helped negotiate a solution that satisfied all involved parties (either before or after a formal investigation). The Commissioner does not issue a Report.
Commissioner Refused to Investigate (s. 45)	The Commissioner has determined there are no reasonable grounds to proceed with a formal investigation as per section 44(4) or the Commissioner refused any further investigation because the Public Body has responded adequately; more appropriately dealt with by another procedure; time elapsed; or trivial, frivolous, vexatious, bad faith, as set out in section 45(1) of ATIPPA, 2015.
Report	On completing an investigation, the Commissioner shall prepare a Report pursuant to section 48 of ATIPPA, 2015.

Means of Resolution (ATIPPA, 2015 Privacy) Explanations

No Jurisdiction	Based on the preliminary information gathered, it was determined that ATIPPA, 2015 did not apply to the organization or activity that was the subject of the Complaint.
Declined to Investigate	Based on the preliminary information gathered, it was determined that the Commissioner declined to commence an investigation because the Complaint was not filed within a reasonable period, as set out in section 73 of ATIPPA, 2015 or was filed prematurely.
Withdrawn	The Complainant no longer wishes to pursue the matter.
Informal Resolution	OIPC helped negotiate a solution that satisfied all involved parties (either before or after a formal investigation). The Commissioner does not issue a Report.
Commissioner Refused to Investigate (s. 75)	The Commissioner has determined there are no reasonable grounds to proceed with a formal investigation as per section 74(2) or the Commissioner refused any further investigation because the Public Body has responded adequately; more appropriately dealt with by another procedure; time elapsed; or trivial, frivolous, vexatious, bad faith, as set out in section 75 of ATIPPA, 2015.
Report	On completing an investigation, the Commissioner shall prepare a Report pursuant to section 77 of ATIPPA, 2015.

Appendix B

**Timelines (business days) for Access Complaints for the
2024-2025 Reporting Period under the
Access to Information and Protection of Privacy Act, 2015**

Public Body	Means of Resolution	Review Started	Days for Informal Review	Formal Review Started	Days for Formal Review	Date Complaint Resolved	Total Days
Town of St. George's	Informal Resolution	2024-11-27	0			2024-11-27	0
Department of Justice and Public Safety	Informal Resolution	2024-11-15	5			2024-11-22	5
Town of Victoria	Informal Resolution	2024-05-03	6			2024-05-13	6
Royal Newfoundland Constabulary	Informal Resolution	2025-03-03	9			2025-03-14	9
Town of Whitbourne	Informal Resolution	2024-04-16	10			2024-04-30	10
Department of Health and Community Services	Informal Resolution	2024-05-14	11			2024-05-30	11
Town of Wabana	Informal Resolution	2024-04-30	11			2024-05-15	11
Town of Botwood	Informal Resolution	2024-03-20	11			2024-04-05	11
Department of Health and Community Services	Informal Resolution	2024-04-11	13			2024-04-30	13
Town of Portugal Cove-St. Philip's	Informal Resolution	2025-01-30	14			2025-02-19	14
Town of Spaniard's Bay	Informal Resolution	2024-03-20	14			2024-04-10	14
Department of Justice and Public Safety	Informal Resolution	2024-11-28	15			2024-12-19	15
Town of Deer Lake	Informal Resolution	2024-03-15	15			2024-04-08	15
Workplace NL	Informal Resolution	2024-11-27	16			2024-12-19	16
Town of Victoria	Informal Resolution	2024-04-26	16			2024-05-21	16
Department of Justice and Public Safety	Informal Resolution	2025-02-04	17			2025-02-27	17
Department of Fisheries, Forestry and Agriculture	Informal Resolution	2024-11-27	17			2024-12-20	17
Town of Springdale	Informal Resolution	2024-03-19	17			2024-04-12	17
Royal Newfoundland Constabulary	Informal Resolution	2024-11-27	18			2024-12-23	18
Department of Digital Government and Service NL	Informal Resolution	2024-12-17	19			2025-01-16	19
Department of Municipal and Provincial Affairs	Informal Resolution	2024-05-03	19			2024-05-31	19
Department of Education	Informal Resolution	2025-02-11	21			2025-03-12	21
Department of Fisheries, Forestry and Agriculture	Informal Resolution	2024-09-13	22			2024-10-16	22
Department of Fisheries, Forestry and Agriculture	Informal Resolution	2024-12-13	22			2025-01-17	22
Provincial Information and Library Resources Board	Informal Resolution	2024-10-18	22			2024-11-20	22
Royal Newfoundland Constabulary	Informal Resolution	2024-12-17	25			2025-01-24	25
Department of Transportation and Infrastructure	Informal Resolution	2024-03-11	26			2024-04-17	26
Serious Incident Response Team	Informal Resolution	2024-05-27	26			2024-07-03	26
NL Health Services	Informal Resolution	2024-09-20	26			2024-10-29	26
Department of Justice and Public Safety	Informal Resolution	2024-11-28	27			2025-01-09	27
Memorial University	Informal Resolution	2024-04-17	27			2024-05-27	27
Town of Portugal Cove-St. Philip's	Informal Resolution	2024-08-02	28			2024-09-13	28
Town of Placentia	Informal Resolution	2024-05-30	28			2024-07-10	28
Memorial University	Informal Resolution	2024-05-06	29			2024-06-17	29

Public Body	Means of Resolution	Review Started	Days for Informal Review	Formal Review Started	Days for Formal Review	Date Complaint Resolved	Total Days
Town of Happy Valley-Goose Bay	Informal Resolution	2024-06-14	30			2024-07-29	30
Department of Justice and Public Safety	Informal Resolution	2024-11-28	33			2025-01-17	33
Memorial University	Informal Resolution	2024-06-11	33			2024-07-29	33
Town of Carbonear	Informal Resolution	2024-12-12	33			2025-01-31	33
Department of Education	Informal Resolution	2024-06-06	35			2024-07-26	35
Town of Witless Bay	Informal Resolution	2024-02-09	35			2024-04-01	35
Royal Newfoundland Constabulary	Informal Resolution	2025-01-08	20	2025-02-05	16	2025-02-27	36
Department of Digital Government and Service NL	Informal Resolution	2024-07-18	37			2024-09-11	37
Memorial University	Informal Resolution	2025-01-16	37			2025-03-10	37
Department of Immigration, Population Growth and Skills	Informal Resolution	2025-01-08	38			2025-03-03	38
Memorial University	Informal Resolution	2024-07-12	38			2024-09-06	38
Town of Millertown	Informal Resolution	2025-01-14	38			2025-03-07	38
Department of Transportation and Infrastructure	Informal Resolution	2024-07-18	39			2024-09-13	39
Memorial University	Informal Resolution	2024-06-07	30	2024-07-22	9	2024-08-02	39
Town of Bonavista	Informal Resolution	2024-09-06	39			2024-11-01	39
NL Health Services	Informal Resolution	2024-10-04	40			2024-12-03	40
Memorial University	Informal Resolution	2024-03-20	30	2024-05-02	11	2024-05-17	41
City of St. John's	Informal Resolution	2024-04-23	42			2024-06-21	42
Town of Victoria	Informal Resolution	2024-12-20	42			2025-02-21	42
Memorial University	Informal Resolution	2024-02-13	43			2024-04-15	43
Treasury Board Secretariat	Informal Resolution	2024-03-07	33	2024-04-24	11	2024-05-09	44
Royal Newfoundland Constabulary	Informal Resolution	2024-09-12	44			2024-11-15	44
Town of Gander	Informal Resolution	2024-11-27	44			2025-01-31	44
Town of Gander	Informal Resolution	2024-11-27	44			2025-01-31	44
Department of Justice and Public Safety	Informal Resolution	2024-07-30	32	2024-09-16	16	2024-10-08	48
Memorial University	Informal Resolution	2024-01-19	50			2024-04-01	50
Department of Health and Community Services	Informal Resolution	2024-06-11	49			2024-08-21	49
Department of Environment and Climate Change	Informal Resolution	2024-11-27	49			2025-02-07	49
Royal Newfoundland Constabulary	Informal Resolution	2024-12-30	49			2025-03-10	49
NL Hydro	Informal Resolution	2024-01-22	49			2024-04-01	49
Newfoundland and Labrador Health Services	Informal Resolution	2024-10-29	49			2025-01-10	49
Memorial University	Informal Resolution	2024-09-16	49			2024-11-26	49
Memorial University	Informal Resolution	2024-09-16	49			2024-11-26	49
Department of Immigration, Population Growth and Skills	Informal Resolution	2024-11-27	50			2025-02-10	50
NL Hydro	Informal Resolution	2024-01-22	50			2024-04-02	50
Royal Newfoundland Constabulary	Informal Resolution	2024-05-15	51			2024-07-29	51
Memorial University	Informal Resolution	2024-02-12	53			2024-04-26	53

Public Body	Means of Resolution	Review Started	Days for Informal Review	Formal Review Started	Days for Formal Review	Date Complaint Resolved	Total Days
Department of Health and Community Services	Informal Resolution	2024-11-27	51	2025-02-11	3	2025-02-14	54
Department of Transportation and Infrastructure	Informal Resolution	2024-01-30	36	2024-03-20	18	2024-04-16	54
Department of Fisheries, Forestry and Agriculture	Informal Resolution	2024-12-18	54			2025-03-07	54
Town of Holyrood	Informal Resolution	2024-05-24	54			2024-08-12	54
Town of Pasadena	Informal Resolution	2024-05-03	55			2024-07-23	55
Department of Environment and Climate Change	Informal Resolution	2024-06-26	57			2024-09-18	57
NL Hydro	Informal Resolution	2024-01-19	57			2024-04-10	57
NL Hydro	Informal Resolution	2024-01-22	57			2024-04-11	57
C.A. Pippy Park Commission	Informal Resolution	2024-10-31	57			2025-01-24	57
Department of Immigration, Population Growth and Skills	Informal Resolution	2024-12-11	58			2025-03-06	58
Department of Municipal and Provincial Affairs	Informal Resolution	2024-03-15	58			2024-06-07	58
Royal Newfoundland Constabulary	Informal Resolution	2024-02-08	58			2024-05-01	58
Memorial University	Informal Resolution	2025-01-02	58			2025-03-25	58
City of St. John's	Informal Resolution	2024-07-22	59			2024-10-16	59
Department of Justice and Public Safety	Informal Resolution	2024-10-29	59	2025-01-24	2	2025-01-28	61
NL Hydro	Informal Resolution	2024-01-08	61			2024-04-03	61
NL Hydro	Informal Resolution	2024-03-20	61			2024-06-17	61
Department of Health and Community Services	Informal Resolution	2024-01-30	62			2024-04-26	62
Department of Environment and Climate Change	Informal Resolution	2024-04-04	62			2024-07-03	62
Newfoundland and Labrador Housing Corporation	Informal Resolution	2024-07-02	45	2024-09-05	18	2024-10-01	63
Memorial University	Informal Resolution	2024-09-20	36	2024-11-13	27	2024-12-20	63
Memorial University	Informal Resolution	2024-09-20	36	2024-11-13	27	2024-12-20	63
Memorial University	Informal Resolution	2024-09-20	36	2024-11-13	27	2024-12-20	63
Memorial University	Informal Resolution	2024-09-20	36	2024-11-13	27	2024-12-20	63
NL Health Services	Informal Resolution	2024-10-31	54	2025-01-21	11	2025-02-05	65
Office of the Premier	Report	2024-04-02	-3	2024-04-01	17	2024-04-24	14
Northern Peninsula Regional Services Board	Report	2025-02-11	17	2025-03-06	13	2025-03-25	30
Northern Peninsula Regional Services Board	Report	2025-01-30	25	2025-03-06	13	2025-03-25	38
Department of Digital Government and Service NL	Report	2024-04-16	32	2024-06-02	7	2024-06-12	39
Department of Education	Report	2024-12-19	25	2025-01-28	20	2025-02-25	45
Executive Council	Report	2024-06-27	30	2024-08-12	24	2024-09-16	54
Department of Justice and Public Safety	Report	2024-02-12	37	2024-04-04	20	2024-05-02	57
Memorial University	Report	2024-07-19	44	2024-09-23	14	2024-10-11	58
City of St. John's	Report	2024-04-15	30	2024-05-28	28	2024-07-08	58
Department of Justice and Public Safety	Report	2024-07-24	36	2024-09-16	23	2024-10-18	59
Royal Newfoundland Constabulary	Report	2024-08-08	47	2024-10-16	12	2024-11-01	59
Labour Relations Board	Report	2024-08-08	54	2024-10-25	5	2024-11-01	59

Public Body	Means of Resolution	Review Started	Days for Informal Review	Formal Review Started	Days for Formal Review	Date Complaint Resolved	Total Days
Department of Justice and Public Safety	Report	2024-04-29	49	2024-07-09	11	2024-07-24	60
Department of Justice and Public Safety	Report	2024-05-24	33	2024-07-11	27	2024-08-20	60
Royal Newfoundland Constabulary	Report	2024-10-21	33	2024-12-06	27	2025-01-17	60
Northern Peninsula Regional Services Board	Report	2024-12-30	35	2025-02-18	25	2025-03-25	60
City of Corner Brook	Report	2024-05-28	57	2024-08-19	3	2024-08-22	60
Department of Education	Report	2024-11-27	41	2025-01-28	20	2025-02-25	61
Department of Justice and Public Safety	Report	2024-06-24	51	2024-09-06	10	2024-09-20	61
Labour Relations Board	Report	2024-09-20	24	2024-10-25	37	2024-12-18	61
Memorial University	Report	2024-11-27	56	2025-02-18	5	2025-02-25	61
Town of Point of Bay	Report	2024-10-22	36	2024-12-12	25	2025-01-21	61
Department of Education	Report	2024-02-29	32	2024-04-16	30	2024-05-29	62
Executive Council	Report	2024-02-27	53	2024-05-13	9	2024-05-27	62
Department of Industry, Energy and Technology	Report	2024-02-06	58	2024-04-29	4	2024-05-03	62
Department of Justice and Public Safety	Report	2024-04-03	24	2024-05-07	39	2024-07-03	63
Department of Justice and Public Safety	Report	2024-04-03	24	2024-05-07	39	2024-07-03	63
Department of Justice and Public Safety	Report	2024-11-27	40	2025-01-27	23	2025-02-27	63
Department of Environment and Climate Change	Report	2024-06-21	54	2024-09-10	9	2024-09-23	63
City of St. John's	Report	2024-09-18	60	2024-12-13	3	2024-12-18	63
City of St. John's	Report	2024-12-20	52	2025-03-07	11	2025-03-24	63
Town of St. George's	Report	2024-11-28	43	2025-01-31	20	2025-02-28	63
Department of Health and Community Services	Report	2024-12-03	43	2025-02-05	21	2025-03-06	64
Department of Justice and Public Safety	Report	2024-04-02	25	2024-05-07	39	2024-07-03	64
Office of the Premier	Report	2024-01-24	47	2024-04-01	17	2024-04-24	64
City of St. John's	Report	2024-07-26	40	2024-09-24	24	2024-10-29	64
Town of Millertown	Report	2024-07-26	62	2024-10-25	2	2024-10-29	64
Memorial University	Report	2024-02-27	31	2024-04-11	34	2024-05-30	65
Department of Health and Community Services	Report	2024-10-22	60	2025-01-20	5	2025-01-27	65
Department of Justice and Public Safety	Report	2024-01-05	42	2024-03-05	23	2024-04-08	65
Department of Justice and Public Safety	Report	2024-01-23	35	2024-03-12	30	2024-04-24	65
Department of Justice and Public Safety	Report	2024-03-13	30	2024-04-25	35	2024-06-14	65
Department of Justice and Public Safety	Report	2024-04-25	56	2024-07-16	9	2024-07-29	65
Department of Justice and Public Safety	Report	2024-07-11	45	2024-09-16	20	2024-10-15	65
Department of Justice and Public Safety	Report	2024-07-11	45	2024-09-16	20	2024-10-15	65
Department of Justice and Public Safety	Report	2024-07-11	45	2024-09-16	20	2024-10-15	65

Public Body	Means of Resolution	Review Started	Days for Informal Review	Formal Review Started	Days for Formal Review	Date Complaint Resolved	Total Days
Department of Justice and Public Safety	Report	2024-07-11	45	2024-09-16	20	2024-10-15	65
Department of Justice and Public Safety	Report	2024-07-11	45	2024-09-16	20	2024-10-15	65
Department of Justice and Public Safety	Report	2024-09-12	37	2024-11-05	28	2024-12-16	65
Department of Justice and Public Safety	Report	2024-11-27	40	2025-01-27	25	2025-03-03	65
Department of Justice and Public Safety	Report	2024-12-06	58	2025-03-03	7	2025-03-12	65
Department of Justice and Public Safety	Report	2024-12-18	56	2025-03-11	9	2025-03-24	65
Department of Fisheries, Forestry and Agriculture	Report	2024-07-09	43	2024-09-10	22	2024-10-10	65
Department of Fisheries, Forestry and Agriculture	Report	2024-09-13	62	2024-12-12	3	2024-12-17	65
Department of Fisheries, Forestry and Agriculture	Report	2024-10-29	50	2025-01-13	15	2025-02-03	65
Royal Newfoundland Constabulary	Report	2024-03-04	62	2024-05-31	3	2024-06-05	65
Royal Newfoundland Constabulary	Report	2024-03-04	62	2024-05-31	3	2024-06-05	65
Royal Newfoundland Constabulary	Report	2024-03-19	33	2024-05-06	32	2024-06-20	65
Royal Newfoundland Constabulary	Report	2024-09-09	40	2024-11-05	25	2024-12-11	65
NL Hydro	Report	2024-01-12	35	2024-03-01	30	2024-04-15	65
NL Hydro	Report	2024-08-30	52	2024-11-15	13	2024-12-04	65
NL Health Services	Report	2024-04-19	53	2024-07-05	12	2024-07-23	65
Memorial University	Report	2024-03-25	52	2024-06-07	13	2024-06-26	65
Memorial University	Report	2024-03-26	51	2024-06-07	14	2024-06-27	65
Memorial University	Report	2024-08-26	36	2024-10-17	29	2024-11-28	65
Memorial University	Report	2024-11-27	55	2025-02-17	10	2025-03-03	65
Memorial University	Report	2024-12-16	51	2025-02-28	14	2025-03-20	65
City of St. John's	Report	2024-04-02	40	2024-05-29	25	2024-07-04	65
City of St. John's	Report	2024-12-27	63	2025-03-27	2	2025-03-31	65
City of Mount Pearl	Report	2024-01-22	63	2024-04-19	2	2024-04-23	65
Town of Gander	Report	2024-10-25	48	2025-01-07	17	2025-01-30	65
Town of Gander	Report	2024-10-25	48	2025-01-07	17	2025-01-30	65
Town of Gander	Report	2024-10-25	48	2025-01-07	17	2025-01-30	65
Town of Gander	Report	2024-11-27	55	2025-02-17	10	2025-03-03	65
Department of Environment and Climate Change	Report	2024-02-16	59	2024-05-10	6	2024-05-21	65
Department of Justice and Public Safety	Report	2024-06-27	59	2024-09-23	6	2024-10-01	65
Memorial University	Report	2024-12-20	51	2025-03-06	14	2025-03-26	65
City of St. John's	Report	2024-08-19	61	2024-11-15	8	2024-11-27	69*
Town of Victoria	Declined to Investigate	2024-06-28	30	2024-08-13	7	2024-08-22	37
Town of Victoria	Declined to Investigate	2024-06-28	30	2024-08-13	7	2024-08-22	37
Town of Gander	Declined to Investigate	2024-07-26	36	2024-09-18	4	2024-09-24	40
Town of Victoria	Declined to Investigate	2024-07-17	43	2024-09-18	3	2024-09-23	46

Public Body	Means of Resolution	Review Started	Days for Informal Review	Formal Review Started	Days for Formal Review	Date Complaint Resolved	Total Days
Town of Marystown	Declined to Investigate	2024-06-25	56			2024-09-16	56
Town of St. George's	Determination on Costs	2024-06-03	65			2024-09-05	65
Central Newfoundland Waste Management	Commissioner Refused to Investigate (s. 45)	2024-02-29	26			2024-04-08	26
City of St. John's	Commissioner Refused to Investigate (s. 45)	2024-07-31	52			2024-10-16	52
Department of Fisheries, Forestry and Agriculture	Commissioner Refused to Investigate (s. 45)	2024-05-17	54			2024-08-05	54
Department of Immigration, Population Growth and Skills	Commissioner Refused to Investigate (s. 45)	2024-12-10	60			2025-03-07	60
Royal Newfoundland Constabulary	Commissioner Refused to Investigate (s. 45)	2024-03-08	60			2024-06-04	60
Newfoundland and Labrador Housing Corporation	Commissioner Refused to Investigate (s. 45)	2024-03-14	60			2024-06-10	60
Town of Victoria	Commissioner Refused to Investigate (s. 45)	2024-01-11	60			2024-04-05	60
Department of Environment and Climate Change	Commissioner Refused to Investigate (s. 45)	2024-11-27	61			2025-02-25	61
Town of St. Anthony	Commissioner Refused to Investigate (s. 45)	2024-02-26	61			2024-05-23	61
Department of Municipal and Provincial Affairs	Commissioner Refused to Investigate (s. 45)	2024-11-27	62			2025-02-26	62
Department of Industry, Energy and Technology	Commissioner Refused to Investigate (s. 45)	2024-11-27	62			2025-02-26	62
Department of Digital Government and Service NL	Commissioner Refused to Investigate (s. 45)	2024-03-22	63			2024-06-21	63
Department of Fisheries, Forestry and Agriculture	Commissioner Refused to Investigate (s. 45)	2024-04-02	63			2024-07-02	63
Central Newfoundland Waste Management	Commissioner Refused to Investigate (s. 45)	2024-03-13	63			2024-06-12	63
Central Newfoundland Waste Management	Commissioner Refused to Investigate (s. 45)	2024-05-01	63			2024-07-31	63
Department of Tourism, Culture, Arts and Recreation	Commissioner Refused to Investigate (s. 45)	2024-03-21	64			2024-06-21	64
Department of Justice and Public Safety	Commissioner Refused to Investigate (s. 45)	2024-06-28	64			2024-10-01	64

Public Body	Means of Resolution	Review Started	Days for Informal Review	Formal Review Started	Days for Formal Review	Date Complaint Resolved	Total Days
Department of Digital Government and Service NL	Commissioner Refused to Investigate (s. 45)	2024-12-04	64			2025-03-07	64
Royal Newfoundland Constabulary	Commissioner Refused to Investigate (s. 45)	2024-03-04	64			2024-06-04	64
Town of Marystown	Commissioner Refused to Investigate (s. 45)	2024-03-12	64			2024-06-12	64
Town of Placentia	Commissioner Refused to Investigate (s. 45)	2024-09-17	64			2024-12-18	64
Royal Newfoundland Constabulary	Commissioner Refused to Investigate (s. 45)	2024-09-24	64			2024-12-27	64
Department of Immigration, Population Growth and Skills	Commissioner Refused to Investigate (s. 45)	2024-07-18	65			2024-10-22	65
Royal Newfoundland Constabulary	Commissioner Refused to Investigate (s. 45)	2024-09-18	61	2024-12-16	4	2024-12-20	65
Town of Gander	Commissioner Refused to Investigate (s. 45)	2024-03-11	65			2024-06-12	65
Memorial University	No Jurisdiction	2024-12-06	1			2024-12-09	1
Town of Millertown	No Jurisdiction	2024-05-10	1			2024-05-13	1
Department of Fisheries, Forestry and Agriculture	No Jurisdiction	2024-04-03	2			2024-04-05	2
Department of Municipal and Provincial Affairs	No Jurisdiction	2024-10-29	2			2024-10-31	2
Town of Victoria	No Jurisdiction	2024-09-16	3			2024-09-19	3
Town of New-Wes-Valley	No Jurisdiction	2024-06-11	8			2024-06-21	8
Town of Witless Bay	No Jurisdiction	2024-04-17	9			2024-04-30	9
Town of Witless Bay	No Jurisdiction	2024-04-17	9			2024-04-30	9
Town of Port au Port East	No Jurisdiction	2024-08-12	10			2024-08-26	10
Town of Port au Port East	No Jurisdiction	2024-08-12	10			2024-08-26	10
Town of Channel-Port Aux Basques	Withdrawn	2024-04-01	0			2024-04-01	0
Town of Pouch Cove	Withdrawn	2024-10-11	1			2024-10-15	1
Town of Terra Nova	Withdrawn	2024-12-17	3			2024-12-20	3
Department of Justice and Public Safety	Withdrawn	2025-03-11	5			2025-03-18	5
Town of Salmon Cove	Withdrawn	2024-08-28	12			2024-09-16	12
Workplace NL	Withdrawn	2025-03-07	15			2025-03-28	15
Town of Glovertown	Withdrawn	2024-04-01	16			2024-04-23	16
Town of Salmon Cove	Withdrawn	2024-08-21	17			2024-09-16	17
Town of Salmon Cove	Withdrawn	2024-08-21	17			2024-09-16	17

*There was a delay in issuing this Report by the legislated 65-day timeframe due to the fact there was no Information and Privacy Commissioner from November 6, 2024, to November 26, 2024, inclusive.

Appendix C

**Timelines (business days) for Privacy Complaints for the
2024-2025 Reporting Period under the
Access to Information and Protection of Privacy Act, 2015**

Public Body	Means of Resolution	Review Started	Date Complaint Resolved	Total Days
Department of Fisheries, Forestry and Agriculture	Informal Resolution	2024-06-19	2024-08-15	39
Town of St. George's	Informal Resolution	2024-06-20	2024-08-16	41
Department of Immigration, Population Growth and Skills	Informal Resolution	2024-06-07	2024-08-12	44
Memorial University	Informal Resolution	2024-07-17	2024-10-16	62
Eastern Health	Informal Resolution	2023-07-17	2024-12-27	371
Newfoundland and Labrador English School District	Informal Resolution	2021-10-29	2024-05-07	657
Department of Justice and Public Safety	Report	2023-11-08	2024-04-17	115
Department of Environment and Climate Change	Report	2023-07-07	2024-03-27	188
Town of Grand Falls-Windsor	Report	2023-04-24	2024-09-05	358
Town of Conception Bay South	Declined to Investigate	2024-06-18	2024-07-30	30
Department of Digital Government and Service NL	Declined to Investigate	2024-06-14	2024-09-20	70
Town of Conception Bay South	Declined to Investigate	2024-07-31	2025-02-18	144
Town of Cape St. George	Declined to Investigate	2023-10-03	2024-07-12	203
Memorial University	Formal Investigation not Conducted	2024-04-24	2024-05-03	7
Town of Victoria	Formal Investigation not Conducted	2023-12-12	2024-04-10	86
Town of Victoria	Formal Investigation not Conducted	2023-10-11	2024-04-10	130
Town of Millertown	Formal Investigation not Conducted	2024-07-26	2025-03-13	164
Treasury Board Secretariat	Formal Investigation not Conducted	2023-05-12	2024-04-01	231
NL Hydro	Formal Investigation not Conducted	2024-01-23	2025-01-15	256
Newfoundland and Labrador English School District	Formal Investigation not Conducted	2021-10-20	2024-04-25	656
Department of Municipal and Provincial Affairs	No Jurisdiction	2024-11-13	2024-11-14	1
Human Rights Commission	No Jurisdiction	2025-03-21	2025-03-28	5

Public Body	Means of Resolution	Review Started	Date Complaint Resolved	Total Days
Royal Newfoundland Constabulary	Withdrawn	2024-12-02	2025-01-10	29
Town of Gander	Withdrawn	2024-11-27	2025-01-24	42
Town of Salmon Cove	Withdrawn	2023-11-15	2024-04-15	108
Department of Immigration, Population Growth and Skills	Withdrawn	2023-09-22	2024-06-11	187

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