ALBERTA

OFFICE OF THE INFORMATION AND PRIVACY COMMISSIONER

ORDER F2020-08

April 16, 2020

ALBERTA ENERGY REGULATOR

Case File Number 002162

Office URL: www.oipc.ab.ca

Summary: An individual made an access request to Alberta Energy Regulator (the Public Body or AER) under the *Freedom of Information and Protection of Privacy Act* (FOIP Act) for an electronic copy of the complete staff directory for the Public Body, including job titles, phone numbers, email addresses and organization structure.

The Public Body located 61 pages of responsive records, but withheld all information citing sections 17(1) and 29. The Applicant requested a review of the Public Body's response.

An inquiry was conducted to review the Public Body's decisions, resulting in Order F2019-09. In that Order, the Adjudicator found that section 17(1) did not apply to any information in the records at issue. The Adjudicator found that section 29 applied to a small amount of information.

In the course of that inquiry, the Public Body made a decision to also apply section 18(1) to the information in the records. The Adjudicator found that the Public Body had not met its burden to show that section 18(1) applied to all information in the records. However, the Adjudicator determined that sufficient information was provided to indicate the possibility that section 18(1) applies to information of particular employees. The Adjudicator ordered the Public Body to provide notice to its employees, and upon receiving the employees' responses, to then provide the names of employees who object to the disclosure of their names, job titles and contact information on the basis of section 18(1) to the Adjudicator. The Adjudicator retained jurisdiction to determine the application of section 18(1) to the information relating to those individuals, after hearing from them.

Sixteen employees provided submissions to this part of the inquiry. The Adjudicator reviewed the submissions of the individual employees, as well as submissions made by the Public Body and Applicant.

The Adjudicator found that several employees met the test for the application of section 18(1)(a), but most did not. The Adjudicator provided a list to the Public Body of employees whose information must be disclosed to the Applicant.

Statutes Cited: AB: *Freedom of Information and Protection of Privacy Act*, R.S.A. 2000, c. F-25, ss. 10, 17, 18, 72, *Health Information Act*, R.S.A. 2000, c.H-5, s.11, *Public Sector Compensation Transparency Act*, S.A. 2015, c. P-40.5 s.6

Authorities Cited: AB: Decision F2012-D-01, Orders F2004-029, F2013-51, F2014-49, F2017-60, F2019-09, H2002-001

Cases Cited: *Merck Frosst Canada Ltd. V. Canada (Health)*, 2012 SCC 3, *Ontario (Community Safety and Correctional Services) v. Ontario (Information and Privacy Commissioner)*, 2014 SCC 31

I. BACKGROUND

[para 1] An individual made an access request to Alberta Energy Regulator (the Public Body) under the *Freedom of Information and Protection of Privacy Act* (FOIP Act) for an electronic copy of the complete staff directory for the Public Body, including job titles, phone numbers, email addresses and organization structure.

[para 2] The Public Body located 61 pages of responsive records, but withheld all information citing sections 17(1) and 29. The Applicant requested a review of the Public Body's response.

[para 3] An inquiry was conducted to review the Public Body's decisions, resulting in Order F2019-09. In that Order, I found that section 17(1) did not apply to any information in the records at issue, as it is not information that has a personal dimension.

[para 4] In the course of that inquiry, the Public Body made a decision to also apply section 18(1) to the information in the records. I found that the Public Body had not met its burden to show that section 18(1) applied to all information in the records. However, I determined that sufficient information had been provided to indicate the possibility that section 18(1) applies to information of particular employees. I said (at para. 55)

> I find that the Public Body has not met its burden to show that section 18(1) applies to the records at issue in their entirety. However, the fact that four individuals have received an exemption under the PSCTA strongly indicates that section 18(1) could apply to the specific information relating to those individuals. While the Public Body has failed to meet its burden of proof with respect to the records in their entirety, it has provided sufficient information for me to conclude that section 18(1) might apply to particular information relating to some individuals. Serious consequences could result from disclosing information to which section 18(1) would apply. As

> such, I am left in a situation in which the usual remedy for a public body's failure to meet its burden of proof – ordering disclosure of the records at issue – could result in harm to some individuals.

[para 5] I directed the Public Body to inform its staff that it has been ordered to disclose their names, job titles, contact information and the organizational structures in the records at issue to an applicant, subject to individual objections on the grounds that disclosure could reasonably be expected to threaten their (or another's) safety or mental or physical health under section 18(1). I further directed the Public Body to inform the individual employees of the standard the Public Body will have to meet for section 18(1) to apply to their information. The Public Body was to then inform me of the names of employees who object to the disclosure of their names, job titles, and business contact information. I advised that these employees would be invited to participate in this part of the inquiry, as individuals affected by the outcome of the inquiry.

[para 6] The Applicant was told only of the number of individuals who have objected. The Public Body was also ordered to disclose the information in the records at issue relating to individuals who did not object to disclosure.

[para 7] The Public Body complied with Order F2019-09. It provided me with a list of the names of 46 employees who objected to the disclosure of their information on the basis of section 18(1).

[para 8] I sent instructions to these employees, via the Public Body, explaining the access request, the issue in the inquiry, the outcome of Order F2019-09, and the test for the application of section 18(1). I instructed the employees as to what information I required from them, stating:

> At the end of this letter I provide references to past Orders of this Office and other cases that may be helpful. However, you do not need to make a legal argument; I need you to tell me in your own words how disclosing your information could reasonably be expected to threaten your (or another's) health or safety. Tell me:
>
> - What is the threat or harm you think could result from disclosure? Be as specific as possible.
> - You do not need to show that the possible threat or harm *will* happen. But the threat or harm has to be more than merely speculative – why do you think the likelihood of harm is more than speculative?
> - What steps have you taken to prevent your information from being disclosed in other ways? For example, have you taken steps to avoid having your name and/or other information made publicly available (e.g. posted on social media)?
> - Do you have a social media presence? If so, how would the disclosure of your work-related information in this case pose a threat to health or safety if having a social media presence does not?
>
> I note that a majority of the 46 individuals who have objected to the disclosure of their information have posted information about their work experience (including AER as employer and job title) on LinkedIn. A few employees were named in AER publications on the AER website. One employee is listed on AER's public staff list on the website (with name, job title and email being disclosed).

> In these cases, the employees should address how the disclosure of their information not already published online (such as a direct phone number) could reasonably be expected to threaten or harm health or safety.
>
> AER has informed me that a few employees have received an exemption under *Public Sector Compensation Transparency Act* (PSCTA). Exemptions under that Act are granted only for reasons of personal safety. If you are one of the employees who has received an exemption, it would be helpful if you would include the information you provided to the relevant official, to obtain that exemption. It is not sufficient to merely state that you have received the exemption; my decision in this case is separate from an exemption decision under the PSCTA.

[para 9] Of those employees who had provided an objection to disclosure, sixteen participated by providing submissions *in camera*. Each employee will be provided a copy of this Order as well as a confidential addendum that addresses the specific concerns raised in their *in camera* submissions.

II. RECORDS AT ISSUE

[para 10] The information at issue consists of the names, job titles and business contact information of the Public Body employees who objected to the disclosure of this information.

III. ISSUES

[para 11] The only issue remaining in this inquiry is:

> Does section 18(1)(a) of the Act (disclosure harmful to individual safety) apply to the information in the records?

IV. DISCUSSION OF ISSUES

Preliminary issue – scope of inquiry

[para 12] In the course of the inquiry, there was confusion about what records are at issue. In complying with Order F2019-09, the Public Body states that it provided an updated directory to the Applicant, redacting the information of Public Body employees who objected. The Public Body believed that these updated records now constitute the records at issue in this inquiry. By letter dated December 5, 2019, I explained to the parties why the records at issue continues to be the 2015 records at issue:

> This inquiry arose from the Public Body's response to the Applicant's access request in 2015. The records identified as responsive by the Public Body <u>at that time</u> continue to be the records at issue here. Records created four years after the access request cannot be responsive to that access request. If the Public Body decided to provide the Applicant with an updated version of the records, that is a matter between the Public Body and the Applicant. It does not alter the scope of this inquiry.

[para 13] Several employees who provided submissions to this part of the inquiry do not have information contained in the records at issue. I was alerted to this fact by one employee who noted that they had not been employed with the Public Body at the time of the Applicant's access request and so were unsure why their information was at issue.

[para 14] I asked the Public Body to confirm that the information relating to four individuals who provided submissions is not contained in the records at issue and it did so. Since that time, I have found one other employee who provided a submission whose information is not contained in the records provided to me.

[para 15] In its submission, the Public Body had also informed me that one employee was no longer with the Public Body. The Applicant confirmed that he is not interested in the names and contact information of former Public Body employees. Therefore, any employee information in the records at issue that has not already been provided to the Applicant and that relates to an employee no longer with the Public Body is no longer at issue in this inquiry.

Preliminary issue – application of section 17(1)

[para 16] One Public Body employee who provided an *in camera* submission to this inquiry argued that I had made an erroneous decision regarding the application of section 17(1).

[para 17] This Order will not revisit the decision in Order F2019-09; however, I will explain why I have invited Public Body employees to participate in an inquiry into the application of section 18(1) when they were not invited to individually participate in the previous process leading to Order F2019-09.

[para 18] In Order F2014-49 I reviewed the case law relevant to inviting affected parties to participate in an inquiry. I reviewed Decision F2012-D-01, in which the adjudicator concluded that it was appropriate to obtain submissions from the public body and applicant in order to determine whether the information was clearly exempt from disclosure, clearly subject to disclosure, or whether the application of the exception was unclear (at para. 36).

[para 19] This decision followed the test set out by the Supreme Court of Canada decision in *Merck Frosst Canada Ltd. V. Canada (Health),* 2012 SCC 3, to determine whether a party is affected such that it ought to be invited to participate in an inquiry. The Court stated (at para. 77):

> As discussed earlier, in order to disclose third party information without giving notice, the head must have no reason to believe that the information might fall within the exemptions under s. 20(1) [of the federal *Access to Information Act*, an exception for third party business information]. Conversely, in order to refuse disclosure without notice, the head must have no reason to believe that the record could be subject to disclosure. If the information does not fall within one of these clear categories, notice must be given.

[para 20] In Order F2019-09, I considered the submissions of the Public Body, and for the reasons provided there, concluded that the information at issue is not information to which section 17(1) can apply. As can be seen from the reasons in that Order, my conclusion regarding

the application of section 17(1) was not subject to the particular circumstances of any Public Body employee. Separate submissions from the employees would not have affected the decision, as I had no reason to believe that section 17(1) might apply to the information.

[para 21] In contrast, the application of section 18(1) in this case *is* dependent on the particular circumstances of Public Body employees. As noted in Order F2019-09 and cited in the background section of this Order, while the Public Body failed to show that section 18(1) applies to all Public Body employee business contact information, the Public Body provided sufficient information to indicate that the information of particular employees may meet the standard for section 18(1) to apply.

[para 22] As such, I invited Public Body employees who believed the disclosure of their contact information could reasonably be expected to cause a harm set out in section 18(1) to provide submissions.

[para 23] To be clear, concerns that the disclosure of business contact information could reasonably be expected to threaten their (or another's) safety or mental or physical health does not give that information a "personal dimension" such that it could be withheld under section 17(1) if it was not otherwise subject to that provision. As discussed in Order F2019-09, even where employees have valid safety concerns regarding the disclosure of their business contact information,

> [t]he fact that employees may have received harassing phone calls, or have valid safety concerns regarding disclosure of their names and workplace does not change the character of business contact information such that it has a personal dimension. In other words, an employer-issued phone number does not become the personal information of the employee to whom it was issued, for the reason that callers have misused the phone number. Other provisions of the Act address such circumstances; specifically section 18(1) (at para. 31).

[para 24] Therefore, concerns about threats to health or safety arising from disclosure are properly considered under section 18(1) and not section 17(1).

1. Did the Public Body properly apply section 18 of the Act (disclosure harmful to individual or public safety) to the information in the records?

[para 25] The Public Body states that 46 individual employees of the Public Body objected to the disclosure of their names, job titles, and business contact information on the grounds that the disclosure could reasonably be expected to threaten their, or another's, safety or mental or physical health, under section 18(1)(a). Sixteen employees provided submissions to this part of the inquiry. Five of those 16 employees are employees whose information is not contained in the records at issue. It is possible that one or more of the remaining 11 employees are no longer with the Public Body such that their information is also not at issue but that is not information I have been provided.

[para 26] Section 18(1)(a) states:

18(1) The head of a public body may refuse to disclose to an applicant information, including personal information about the applicant, if the disclosure could reasonably be expected to

(a) threaten anyone else's safety or mental or physical health

...

[para 27] The Public Body cited section 6 of the *Public Sector Compensation Transparency Act* (PSCTA), which states:

6(1) The Lieutenant Governor in Council may, by regulation, exempt from the application of part or all of this Act part or all of a public sector body or a health entity referred to in section 5(3) to which this Act would otherwise apply.

(2) The Minister may, in writing,

(a) on application by an employee of the Government of Alberta, exempt the Government of Alberta from any part or all of the requirement to disclose under this Act in respect of the employee if in the opinion of the Minister that disclosure could unduly threaten the safety of the employee;

[para 28] I reviewed the case law on the application of section 18(1)(a) in Order F2019-09, but for ease of reference I will repeat it here.

[para 29] In Order H2002-001, former Commissioner Work considered what must be established in order for section 11(1)(a)(ii) of the *Health Information Act*, which is similar to section 18 of the FOIP Act, to be applicable. He reviewed previous Orders of this Office addressing what is necessary to establish a reasonable expectation of harm under section 18 of the FOIP Act and adopted the following approach:

> In Order 2001-010, the Commissioner said there must be evidence of a direct and specific threat to a person, and a specific harm flowing from the disclosure of information or the record. In Order 96-004, the Commissioner said detailed evidence must be provided to show the threat and disclosure of the information are connected and there is a probability that the threat will occur if the information is disclosed.

[para 30] This analysis has been followed with respect to section 18(1)(a) of the FOIP Act. In Order F2013-51, the Director of Adjudication reviewed past orders of this office regarding the application of section 18. She summed up those orders as follows (at paras 20-21):

> These cases establish that section 18 of the FOIP Act applies to harm that would result from disclosure of information in the records at issue, but not to harm that would result from factors unrelated to disclosure of information in the records at issue. Further, a public body applying section 18 of the FOIP Act must provide evidence to support its position that harm may reasonably be expected to result from the disclosure of information (as must a custodian applying section 11(1)(a) of the HIA).
>
> Following the approach adopted by the former Commissioner in Order 96-004, and in subsequent cases considering either section 18 of the FOIP Act or section 11 of the HIA, the onus is on the Public Body to provide evidence regarding a threat or harm to the

> mental or physical health or safety of individuals, to establish that disclosure of the information and the threat are connected, and to prove that there is a reasonable expectation that the threat or harm will take place if the information is disclosed.

[para 31] In Order F2004-029, the adjudicator also stated that "being difficult, challenging, or troublesome, having intense feelings about injustice, being persistent, and to some extent, using offensive language, do not necessarily bring section 18 into play" (at para. 23).

[para 32] I agree with the above analyses. Further, the Supreme Court of Canada has clearly enunciated the test to be used in access-to-information legislation wherever the phrase "could reasonably be expected to" is found (such as in section 18(1)(a)). In *Ontario (Community Safety and Correctional Services) v. Ontario (Information and Privacy Commissioner)*, 2014 SCC 31 (CanLII), the Court stated:

> Given that the statutory tests are expressed in identical language in provincial and federal access to information statutes, it is preferable to have only one further elaboration of that language; *Merck Frosst*, at para. 195:
>
> > I am not persuaded that we should change the way this test has been expressed by the Federal Courts for such an extended period of time. Such a change would also affect other provisions because similar language to that in s. 20(1)(c) is employed in several other exemptions under the Act, including those relating to federal-provincial affairs (s. 14), international affairs and defence (s. 15), law enforcement and investigations (s. 16), safety of individuals (s. 17), and economic interests of Canada (s. 18). In addition, as the respondent points out, the "reasonable expectation of probable harm" test has been followed with respect to a number of similarly worded provincial access to information statutes. Accordingly, the legislative interpretation of this expression is of importance both to the application of many exemptions in the federal Act and to similarly worded provisions in various provincial statutes. [Emphasis added.]
>
> This Court in *Merck Frosst* adopted the "reasonable expectation of probable harm" formulation and it should be used wherever the "could reasonably be expected to" language is used in access to information statutes. As the Court in *Merck Frosst* emphasized, the statute tries to mark out a middle ground between that which is probable and that which is merely possible. An institution must provide evidence "well beyond" or "considerably above" a mere possibility of harm in order to reach that middle ground: paras. 197 and 199. This inquiry of course is contextual and how much evidence and the quality of evidence needed to meet this standard will ultimately depend on the nature of the issue and "inherent probabilities or improbabilities or the seriousness of the allegations or consequences": *Merck Frosst*, at para. 94, citing *F.H. v. McDougall*, 2008 SCC 53 (CanLII), [2008] 3 S.C.R. 41, at para. 40.

[para 33] The Supreme Court of Canada has made it clear that there is one evidentiary standard to be used wherever the phrase "could reasonably be expected to" appears in access-to-information legislation. There must be a reasonable expectation of probable harm, and the Public Body must provide sufficient evidence to show that the likelihood of any of the above scenarios is "considerably above" a mere possibility.

[para 34] In Order F2017-60, I accepted that the names and contact information of Civil Forfeiture Office (CFO) employees in Justice and Solicitor General could be withheld under

section 18(1). The CFO restrains and forfeits property found to be obtained by crime or used to commit a crime.

[para 35] The evidence I considered persuasive in that case included the fact that steps were taken to ensure that these employees do not deal directly with individuals whose property is seized; even contact with service providers is done with a general email address and not an address that identifies the individual employee.

[para 36] In that case, I also accepted that CFO employees deal with individuals accused of, or convicted of, serious offences under the *Criminal Code* or *Controlled Drugs and Substances Act*. I found that this "makes the likelihood of a threat to safety or health higher than it would be in relation to other public body employees that may deal with a very small percentage of such individuals" (at para. 45). I also noted that property confiscated by the CFO may not have been merely the proceeds of crime but also the means by which crimes were committed; this is an additional motive for those individuals to attempt to regain the property by harassing or threatening CFO employees who know the location of the property.

[para 37] I also noted in that case that the finding was fact-specific. I said (at para. 50):

> This finding should be kept to the particular facts of this case. It is not unusual for public body employees to have to deal with difficult, or even violent members of the public, in the normal course of their duties. I do not mean to suggest that the names of those employees also ought to be withheld from the public.

[para 38] As noted in Order F2017-60, it is not unusual for public body employees to deal with difficult, aggressive, harassing, abusive, or even violent individuals. The Public Body has a communications protocol to address these individuals, such that Public Body employees are not required to handle those calls, outside the single point of contact. Absent additional evidence of a specific threat or harm, the fact that some individuals are abusive on the phone is not sufficient to meet the standard required by section 18(1).

[para 39] As previously stated, the fact that four individuals have received an exemption under the PSCTA strongly indicates that section 18(1) could apply to their information. Given the serious consequences that could result from disclosing information to which section 18(1) would apply, I requested submissions from the Public Body employees who believed the disclosure of their names and business contact information met the test for the application of section 18(1).

[para 40] Of the employees who had indicated an objection to the disclosure of their information, sixteen provided submissions. The Public Body told me that an additional nine employees had objected but either stated they would not provide a submission or did not respond to the request for a submission.

[para 41] Regarding the individuals who had indicated an objection to disclosure but who did not provide a submission, the Public Body has argued that I cannot assume these employees now consent to disclosure of their information. As I have previously explained to the Public Body, the test for disclosure is whether section 18(1)(a) applies; consent is irrelevant.

[para 42] In my letter provided to the Public Body employees via the Public Body, I informed the employees that "[f]ailure to provide sufficient information to find that section 18(1)(a) applies in your case could result in an order for AER to disclose your information to the Applicant." This is because the application of section 18(1) requires a test to be met; without evidence that the test is met, I cannot uphold its application.

[para 43] Therefore, I must conclude that section 18(1) does not apply to the names, job title and contact information of the Public Body employees who did not provide a submission to this inquiry.

[para 44] Regarding the employee submissions, I cannot reveal the details as I accepted them *in camera*. However, I can explain in general terms the types of arguments I find meet the test for section 18(1)(a) and those that do not.

[para 45] Some employees questioned the value of the access request and/or the intention of the Applicant in making it. The Act permits applicants to request any information in the custody and control of a public body regardless of the motive, subject to the exclusions in sections 4(1) and 6, none of which apply here. In other words, the motives of the Applicant and the objective value of the access request are irrelevant.

[para 46] Some employees argued that they have a right to know the identity of the Applicant. However, neither the Public Body nor this Office can disclose the identity of an applicant to third parties whose information is affected by the request. In any event, as I had told the employees in my instructions, the Applicant is free to do whatever they want with the records they receive, including publishing them. In that way, the identity of the Applicant is not relevant as other people may gain access to the records as well.

[para 47] Some employees pointed to negative comments made about the Public Body as a whole, and have opined that there may be a desire to cut jobs from the Public Body. They have expressed concern about the disclosure of the organizational structure as something that could lead to job losses.

[para 48] As a result of Order F2019-09, the Public Body has disclosed the organizational structure to the Applicant. Only the names of employees who objected to the disclosure of their information has been withheld at this point. Further, not every employee is named in the organizational structure; it shows only higher levels of reporting in the Public Body. Even if job losses are a harm contemplated under section 18(1)(a), I fail to see how the disclosure of particular employee names in the organizational chart could reasonably be expected to lead to those employees losing their jobs.

[para 49] Several employees provided sufficient evidence to meet the test for section 18(1)(a). Evidence included information about past situations in which personal contact information had been used to harass, stalk, and impersonate the employees. To be clear, this harassment etc. amounted to more than unpleasant conversations with members of the public; these circumstances as described to me threatened the safety or security of the employee and/or their families. In these cases, I have accepted that section 18(1)(a) applies to the employees'

information in the records at issue, as the disclosure of additional contact information could reasonably be expected to lead to similar harassment etc. as the personal contact information had already been used to perpetrate.

[para 50] Where an employee has recently had issues with identity theft using their personal contact information, it seems reasonable to expect that disclosing additional contact information, including business contact information, could perpetuate this harm. In other words, a problem already exists and disclosing additional information, even information as innocuous as a job title, work phone number and email, could make the existing problem worse.

[para 51] In contrast, where no problem exists, it is difficult to see how disclosing business contact information could reasonably be expected to *lead* to identity theft. This is especially true for those employees who have disclosed work-related information online, which a number of the employees making submissions to this inquiry have done. With respect to general phishing scams and phone scams, these occur seemingly regardless of whether the information is on a publicly available directory or not. Without additional information showing that additional information of the employee has already been obtained and used for such purposes, I find the general concerns about phishing and identity theft to be too speculative to meet the standard for section 18(1)(a).

[para 52] Many employees expressed concern about an increase in abusive communications if their direct email addresses and phone numbers are disclosed. I rejected that argument in Order F2019-09 (at paras. 43, 49-51) and again at paragraphs 37-38 of this Order. In contrast, where an employee has provided sufficient evidence to show that their personal information has been used to harass the employees, that harassment has amounted to more than unpleasant calls; it has called into question the safety of the employee. I cannot provide more detailed reasons for this finding in my public order, in case those reasons identify the employees who have made these arguments.

[para 53] Of the sixteen employees who made submissions to this part of the inquiry, several have provided sufficient information to meet the test for the application of section 18(1)(a), but most have not. Each employee who has written a submission will be given an addendum to this Order addressing their particular arguments in more detail. The Public Body will also be given an addendum identifying whose information must be disclosed as a result of my decision.

[para 54] The Public Body refused to contact one employee who was on leave from the Public Body when submissions were requested. As such, that individual has not had an opportunity to provide a submission. I will order the Public Body to determine if this individual continues to be employed by the Public Body; if not, the information related to that employee is no longer at issue (per para. 15 above). If that employee continues to be a Public Body employee, the Public Body is to consult with that employee regarding the application of section 18(1)(a) to their information. The Public Body is then to make a decision as to the application of section 18(1)(a) to that employee's information and inform the Applicant of this decision. If the Public Body determines that section 18(1)(a) applies to that employee's information, the Public Body will explain to the Applicant, without disclosing personal information of that employee, how it came

to this determination and how this determination is consistent with my application of section 18(1)(a) in this Order.

V. ORDER

[para 55] I make this Order under section 72 of the Act.

[para 56] I find that section 18(1) applies to a few items of information in the records at issue. I will order the Public Body to disclose the information described in a separate confidential addendum to this Order.

[para 57] I order the Public Body to consult with the employee on leave, make a determination regarding the disclosure of that employee's information, and inform the Applicant of its decision as set out at paragraph 54 of this Order.

[para 58] The Public Body is to provide a copy of this Order with the appropriate confidential addendum to each employee who provided a submission to this inquiry.

[para 59] I further order the Public Body to notify me in writing, within 50 days of receiving a copy of this Order, that it has complied with the Order.

_____

Amanda Swanek
Adjudicator