



OFFICE OF THE INFORMATION
AND PRIVACY COMMISSIONER

NEWFOUNDLAND AND LABRADOR

2025-2026 Annual Report





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AND PRIVACY COMMISSIONER
NEWFOUNDLAND AND LABRADOR

October 19, 2026

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 (OIPC) 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, 2025, to March 31, 2026.

As Commissioner, I am privileged to oversee the work of the OIPC and to provide guidance and leadership. I am pleased to report on the results from the 2025-2026 commitments in our Activity Plan of 2023-2026.

Yours truly,

Kerry Hatfield
Information and Privacy Commissioner

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COMMISSIONER'S MESSAGE

As a statutory oversight office, we balance a rigorous legal mandate with growing public awareness of access and privacy rights and a steadily increasing volume of complaints. Despite these pressures, the Office of the Information and Privacy Commissioner remains stable, efficient, and unwavering in its commitment to protecting the public's right of access to information and privacy.

The size of our Office has not increased since 2017, yet our dedicated staff continue to provide independent and effective oversight for complainants, public bodies, and custodians across Newfoundland and Labrador. Through professionalism, engagement, and a shared commitment to public service, we continue to deliver results and maintain the confidence of those who rely on our Office.

Artificial Intelligence

The 2025-2026 fiscal year confirmed what this Office has anticipated for many years: the era of artificial intelligence (AI) and biometric technologies is no longer on the horizon; it has arrived. AI systems are increasingly being deployed across both the public and healthcare sectors. At the same time, cybersecurity threats continue to intensify, and public concern about access, privacy, and data protection grows with each passing year. We are entering a period of rapid technological transformation, one that requires regulators, governments, organizations, and citizens alike to remain vigilant, informed, and adaptable. Protecting access and privacy rights in this evolving environment demands ongoing learning, thoughtful oversight, and a willingness to respond quickly to emerging challenges.

Activity Plan and Youth Privacy

When I became Commissioner in late 2024, one of my primary goals was to ensure that this Office operated as efficiently and effectively as possible while continuing engagement with those who interact with this Office. In 2026, we launched our new Activity Plan, which focuses on enhancing operational efficiencies, strengthening service delivery, and building upon the strong foundation established by my predecessors.

Another priority for me has been youth privacy. As a parent of two teenagers, I understand firsthand the challenges families face in helping young people navigate an increasingly complex digital world. Teaching youth about online safety, personal information, and privacy protection has never been more important.

Our youth privacy initiative is being implemented in two phases. The first phase is now complete with the launch of the Youth Privacy Resource Hub on our website. The Hub provides a wide range of educational resources for children and youth of all ages, including colouring activities, quizzes, graphic novels, lesson plans, and practical guidance on online privacy and digital citizenship. It serves as a valuable resource for students, parents, educators, and anyone interested in helping young people better understand their privacy rights and responsibilities.

Phase Two will feature the release of five youth-focused videos entitled **Think Digital Privacy**. These engaging and relevant videos are designed to spark meaningful conversations about privacy in the digital age and encourage young people to think critically about how they share, manage, and protect their personal information online. Together, these initiatives reflect our commitment to public education and our mandate to promote awareness and understanding of access and privacy rights throughout the province.

Demand for Transparency

The increasing demand for transparency is clearly reflected in the number of access requests submitted to public bodies since the enactment of the **Access to Information and Protection of Privacy Act, 2015**. In 2015-2016, public bodies received 1,420 access requests. By 2020-

2021, that number had risen to 2,733. In 2024-2025, public bodies received 4,355 requests. During this same period, the volume of complaints received by this Office also continued to increase. These figures represent more than statistics. They reflect individuals exercising their legal rights, seeking accountability from public institutions, and expecting transparent government.

Throughout the past year, I have been encouraged by the strong commitment to access and privacy demonstrated across our province. I have been particularly impressed by the thoughtful coverage of access and privacy issues by the media, the collaborative relationships this Office has developed with public bodies and government institutions, and the constructive engagement we continue to receive from stakeholders. While our role is independent and often requires us to scrutinize decisions and practices, meaningful progress is achieved when institutions, oversight bodies, and the public work together to strengthen transparency, accountability, and privacy protection.

As we look ahead, the challenges facing access and privacy rights will continue to evolve. Emerging technologies, growing public expectations, and increasing demands for accountability will require ongoing vigilance and leadership. I am confident that the Office of the Information and Privacy Commissioner is well positioned to meet these challenges and continue serving the people of Newfoundland and Labrador.

Kerry Hatfield
Information and Privacy Commissioner

ABOUT US

MANDATE

A mandate allows OIPC to set out its purpose, goals, and authority to deliver a multitude of services to the citizens of Newfoundland and Labrador. OIPC's mandate is derived from the provisions of the **Access to Information and Protection of Privacy Act, 2015** (ATIPPA, 2015) and the **Personal Health Information Act** (PHIA).

Under ATIPPA, 2015 our mandate includes:

- being an advocate for the public right of access to information;
- being an advocate for protection of privacy;
- receiving privacy breach reports which public bodies must forward to OIPC on a mandatory basis and providing feedback and consultation to public bodies on their breach responses;
- educating public bodies about compliance with the access provisions of the Act, including the duty to assist, in order to facilitate timely and user friendly application of the Act;
- investigating complaints in relation to a decision, act, or failure to act of a public body that relates to an access to information request;
- conducting privacy investigations in response to complaints or at the Commissioner's own motion;
- receiving, investigating and making a final determination in relation to time extension requests from public bodies;
- receiving, investigating and making a determination in relation to a request from a public body that it be allowed to disregard an access to information request from an applicant;

- receiving an application from a person who has filed an access request to revise costs associated with the request and to make a final determination regarding the costs which may be charged by the public body;
- receiving an application from a person who has filed an access request to review a decision by the head of a public body not to waive the payment of costs associated with the request and to make a final determination in the matter;
- making recommendations to public bodies to ensure compliance with the Act and Regulations and to better achieve the objectives of the Act;
- informing and educating the public about the Act;
- monitoring and auditing the practices and procedures employed by public bodies in carrying out their responsibilities and duties under the Act;
- reviewing and authorizing the collection of personal information from sources other than the individual the information is about;
- reviewing privacy impact assessments prepared by public bodies;
- receiving comments from the public about the administration of the Act and about matters concerning access to information and the confidentiality, protection, and correction of personal information;
- commenting on the implications for access to information and protection of privacy of proposed legislation, programs, and practices of public bodies;
- commenting on the implications of record linkages and information technology on the protection of privacy;
- informing the head of a public body about a failure to adequately assist an applicant; and
- making recommendations to public bodies or the Minister responsible for this Act about the administration of the Act.

Under PHIA, OIPC's mandate includes:

- investigating a decision, act or failure to act of a custodian that relates to an access request for personal health information or a request for correction of personal health information;
- investigating complaints where an individual believes on reasonable grounds that a custodian has contravened or is about to contravene a provision of PHIA or the Regulations with respect to his or her personal health information or the personal health information of another, including privacy breaches;
- making recommendations to support compliance with PHIA;
- informing the public about PHIA;
- receiving comments from the public about matters concerning the confidentiality of personal health information or access to that information;
- commenting on the implications for access to or confidentiality of personal health information of proposed legislative schemes or programs or practices of custodians; and
- commenting on the implications for the confidentiality of personal health information of using or disclosing personal health information for records linkage or using information technology in the collection, storage, use or transfer of personal health information.

OUR VALUES

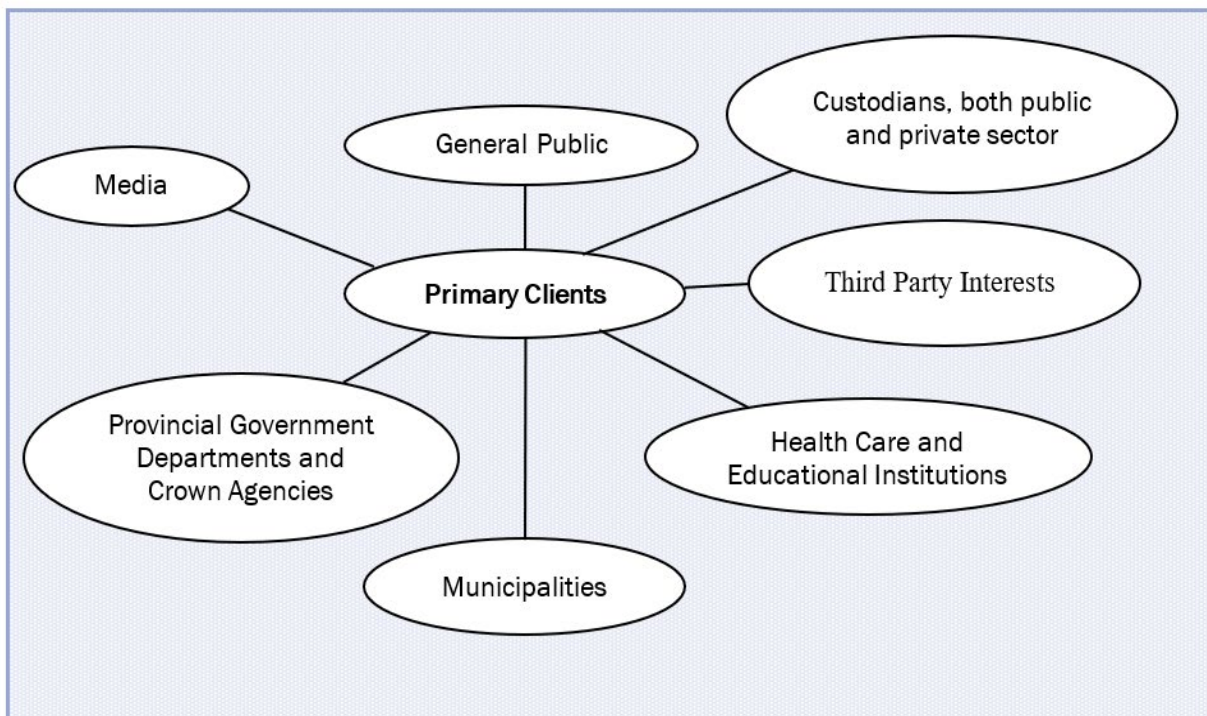
The following values guide OIPC as it upholds its commitment as an independent office.

Independence	OIPC will conduct investigations independent of any influence.
Integrity	OIPC will provide accurate, unbiased advice and recommendations.
Confidentiality	OIPC will maintain confidentiality in accordance with the law.
Respect	OIPC will listen to and consider the ideas and opinions of others, and work collaboratively to achieve results.

WHO WE SERVE

OIPC defines its primary clients as the people of the province and the entities whose activities OIPC oversees, as well as any others who are granted rights or bear responsibilities under ATIPPA, 2015 and PHIA. These clients are made up of several groups.

WE SERVE



OUR VISION

To protect and strengthen the rights of access to information and privacy under ATIPPA, 2015 and PHIA, and to ensure those rights are respected and upheld.

LINES OF BUSINESS

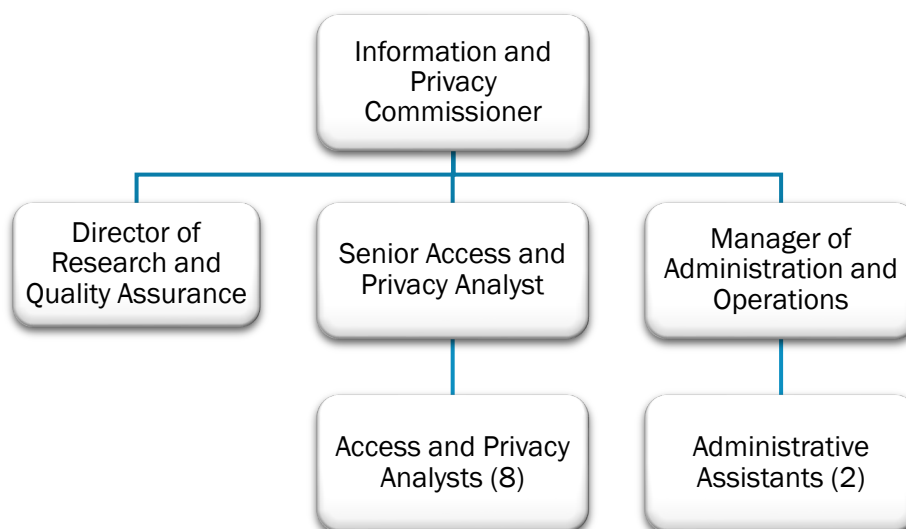
We carry out our mandates under ATIPPA, 2015 and PHIA through two lines of business:

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:
 - 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.

Both branches share responsibility for reviewing privacy breach reports, processing time extension and disregard applications, as well as responding to general inquiries related to ATIPPA, 2015 and PHIA.

ORGANIZATIONAL STRUCTURE

OIPC has 14 permanent positions and one temporary position represented by the following organizational chart.



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 2025-2026 please visit our [website](#).

BY THE NUMBERS			
	2025-2026	2024-2025	2023-2024
Access to Information and Protection of Privacy Act, 2015 (ATIPPA, 2015)			
Access Complaints Received	180	217	236
Privacy Complaints Received	28	23	50
Time Extension Applications Received	1,089	1,102	820
Disregard Applications Received	148	109	53
Breach Notifications Received	185	162	185
Personal Health Information Act (PHIA)			
Access Complaints Received	12	3	6
Privacy Complaints Received	10	9	16
Breach Notifications Received	21	32	26
Advocacy and Compliance			
Guidance Documents*	5	9	11
Education, Training, and Outreach Initiatives	25	15	31
Privacy Impact Assessments (PIAs)	3	4	2

*Includes originals and revisions.

BUDGET AND FINANCIAL STATEMENT

The 2025-2026 budget for OIPC was \$1,618,100. 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, 2026 (unaudited).

	Actual \$	Estimates Amended \$	Original \$
6.1.01. OIPC			
01 Salaries	1,257,372	1,277,900	1,314,000
02. Employee Benefits	9,379	9,400	4,500
03. Transportation & Communications	20,129	35,300	35,300
04. Supplies	15,172	15,600	6,700
05. Professional Services	26,726	35,500	75,000
06. Purchased Services	207,441	208,800	175,600
07. Property, Furnishings & Equipment	<u>35,446</u>	<u>35,600</u>	<u>7,000</u>
02. Revenue – Provincial			
Total: OIPC	<u>1,571,665</u>	<u>1,618,100</u>	<u>1,618,100</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.

HIGHLIGHTS

YOUTH PRIVACY RESOURCES HUB

In 2026, we launched our Youth Privacy Resources webpage, a resource hub designed to support young people, parents, and educators in navigating today's digital world. Recognizing that protecting the personal information of children and youth is more important than ever, we brought together an engaging collection of tools, guidance, and age-appropriate educational materials to foster strong privacy awareness. The webpage offers lesson plans for a wide range of grade levels, activity sheets, online activities, and additional resources, aimed at helping youth understand their privacy rights, manage their personal information, and make informed choices online. Some materials were also available in French and were added to our French resources' webpage.



English Youth Privacy Resources: <https://www.oipc.nl.ca/resources/youth-privacy-resources/>

Ressources relatives à la protection de la vie privée des jeunes: <https://www.oipc.nl.ca/renseignements-en-francais/>

FEDERAL, PROVINCIAL, AND TERRITORIAL JOINT STATEMENTS

The annual meeting of the federal, provincial and territorial (FPT) Information and Privacy Commissioners and Ombudspersons took place on October 8-9, 2025, in Banff, Alberta. Commissioner Hatfield joined other FPT Information and Privacy Commissioners and Ombudspersons to sign two important joint resolutions. All signed joint resolutions are located on our [website](#).



Joint Resolution on Educational Technologies

This resolution, titled, **Protecting the privacy of children and youth through responsible use of educational technologies in the classroom**, calls on governments, schools, school boards, post-secondary institutions, and EdTech vendors to recognize that the information of children and youth is sensitive, and to ensure that privacy rights and the best interests of the child are paramount in the development, procurement, and deployment of educational technologies.

Joint Resolution on Promoting a More Robust Information Ecosystem

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.

HELPING CUSTODIANS NAVIGATE AI SCRIBE TECHNOLOGIES

Custodians across our province are increasingly exploring AI scribe technologies to support clinical documentation, but many face uncertainty about how these technologies align with their obligations under the **Personal Health Information Act (PHIA)**.

To help custodians navigate this evolving and challenging space, we created the following resources:

- ✓ **AI Scribe Guidance**
- ✓ **AI Scribe Self-Assessment Tool.**

Together, our resources will assist custodians in assessing proposed or existing AI scribe use, understanding privacy risks, and achieving compliance with PHIA requirements.

We are scheduled to highlight our AI scribe resources in a panel discussion at the upcoming International Association of Privacy Professionals' 2026 Canada Symposium. We look forward to sharing our work and contributing to national discussions on AI governance in health care.



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 3: By March 31, 2026, 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.

2025-2026

Indicator
1

Will review, update, or create policies or procedures that assist Office business practices.

Actual Performance	Two record retention and destruction schedules submitted in the previous fiscal year were approved and three new retention and destruction schedules were developed, submitted, and received conditional approval from the Government Records Committee during this reporting period. Upon monitoring and reviewing OIPC’s administrative and operational procedures, we identified areas for improvement in four existing procedures, and these adjustments will be made in the next reporting period. These retention schedules and updated procedures will assist in improving and streamlining business practices of the Office.
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Indicator
2

Will review, update, or create internal facing resources that assist Office business practices.

Actual Performance	As part of our commitment to create internal resources that support effective Office operations, we developed a new Unreasonable Behaviour Policy and Procedure. This internal-facing policy establishes a consistent, fair, and transparent approach for identifying and managing unreasonable behaviour directed toward our staff. It clarifies expectations for respectful communication, outlines behaviours that may be considered unreasonable, and provides guidance to ensure staff can respond in a safe, impartial, and effective manner. The policy was created in response
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to an increasing number of complex or challenging interactions and the need for a clear organizational framework to protect staff, maintain respectful engagement, and support the efficient delivery of services. The development of this policy strengthens internal business practices by promoting consistency, improving staff confidence in managing difficult situations, and safeguarding the integrity of our Office's work.

Indicator

3

Will review, update, or create public facing resources that assist Office business practices.

Actual Performance

We developed new **Written Authorization Forms** for both ATIPPA, 2015 and PHIA, providing a clear and standardized method for individuals to authorize another person to act on their behalf during the complaint process. These forms strengthen our complaint handling procedures by ensuring consent is documented in a consistent and transparent manner.

We updated our suite of public brochures that address PHIA, ATIPPA, 2015, and our office functions. These brochures provide information about our access and privacy processes and help the public better understand how they can engage with our Office.

We created **public education posters** this year. The **It's Your Right to Know Poster**, highlights the public's right to access information and was distributed to libraries across the province. With the consent of the Canadian Standards Association, we developed a vibrant **Privacy Principles Poster** listing out the ten CSA Model Code principles which was circulated to public body coordinators. Both posters continue to be publicly available on our website. Together, these new resources strengthen public understanding of access and privacy while supporting our education mandate.

Discussion of Results

Over the reporting period, we made meaningful progress toward our strategic priority of Improving Business Practices, advancing both the quality and consistency of our internal operations and the clarity of our public-facing resources. Through the review, updating, and creation of policies, procedures, and guidance tools, we strengthened the foundations that support our daily work and enhanced the resources available to the public and stakeholders. In undertaking this work, we have identified the need to further reinforce our own information governance framework to ensure that our internal practices continue to align with evolving standards and best practices. This recognition will guide future improvements as we continue to improve and modernize our operations.

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 3: By March 31, 2026, the Office of the Information and Privacy Commissioner will have evaluated and continued the implementation of 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

Indicator

1

Will have continued to communicate with other privacy offices.

Actual Performance

We communicated with other Canadian privacy oversight bodies to support our strategic priority of enhancing digital privacy rights for child and youth students. Staff engaged with counterparts at the Information and Privacy Commissioner of Ontario (IPC Ontario), including meeting with their social media team to learn about youth-focused outreach strategies.

Indicator

2

Will have continued to receive input from relevant stakeholders or counterparts at other privacy offices.

Actual Performance

Through our evaluation of existing outreach efforts, we determined that direct input from youth was necessary to strengthen the relevance and impact of our work. Incorporating the perspectives of young people was recognized as essential to ensuring our initiatives were meaningful, effective, and reflective of their lived experiences.

To guide the development of our youth-focused video series on privacy risks, we received youth input from our **youth survey** distributed to youth in our province. IPC Ontario also supported our initiatives by circulating our youth privacy survey to their Youth Advisory Council. We gained additional insights through direct engagement with students from our province through a **youth focus group** held at Gonzaga High School.

Our staff broadened their knowledge in youth privacy by engaging in relevant **youth privacy professional development** opportunities, including training on “sharenting” and adult responsibilities in protecting minors’

privacy, as well as IAPP sessions on children's digital safety and evolving youth privacy issues.

This combination of youth input and ongoing staff learning ensured that our initiatives were grounded in real-world experiences and current privacy trends affecting students.

Indicator

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.

Actual Performance

We advanced several key projects designed to enhance youth digital privacy rights and awareness. Staff conducted a detailed **review of youth-oriented privacy resources** from other Canadian privacy oversight bodies and organized selected materials into four categories: lesson plans, activity sheets, online activities, and additional resources. These were compiled into a dedicated **Youth Privacy Resources hub** on our website, promoted prominently through a new homepage button with all resources made available in English, as well as some being available in French.

We initiated the development of a series of short **youth-focused educational videos** aimed at addressing risks such as cyber bullying, oversharing on social media, and AI-generated deepfakes. Informed directly by input from youth, this video series was designed to help young people navigate privacy challenges in an increasingly digital environment. This project is now well underway, with video content in the final stages of completion.

Together, these initiatives represent concrete progress in supporting youth privacy education and strengthening protections for students within the education system.

Discussion of Results

This year, we advanced our strategic priority of enhancing the digital privacy rights of child and youth students by strengthening collaboration with Canadian privacy oversight bodies, integrating meaningful input from youth, and launching key educational initiatives. We engaged with counterparts at IPC Ontario, gathered youth perspectives through surveys and a local high school focus group, and enhanced staff knowledge through targeted youth-privacy professional development. Guided by this input and learning, we developed a new Youth Privacy Resources hub and initiated a youth-focused video series addressing emerging digital privacy risks. Together, these efforts demonstrate clear progress in improving privacy awareness and protection for students across 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 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 that 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 3: By March 31, 2026, the Office of the Information and Privacy Commissioner will have utilized information learned from internal education and training opportunities in new and ongoing advocacy and public education initiatives as well as begun to inform related future planning and policymaking objectives of the Office.

2025-2026

Indicator

1

Will have continued to identify emerging technologies.

Actual Performance

Throughout the year, we actively monitored developments in emerging technologies with potential implications for privacy oversight. Staff maintained awareness by reviewing OCIO communications, participating in events such as Data Privacy Day, and engaging in discussions on AI deployment, algorithmic decision-making, cybersecurity trends, and the evolving risks associated with new technologies. These activities ensured that our Office remained informed of emerging tools, practices, and threats relevant to our mandate.

Indicator

2

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

Actual Performance

We consistently identified and promoted training opportunities to strengthen staff understanding of emerging technologies. Staff were encouraged to access OCIO's AI Policy, Training and Awareness Tools, complete courses on PS Access, and participate in relevant webinars. Additional opportunities were sourced through IAPP web conferences and KnowledgeNet sessions, covering topics such as AI governance, automated decision-making, cybersecurity insurance considerations, and evolving regulatory landscapes.

Indicator

3

Will have continued education and training related to emerging technologies.

Actual Performance

Staff completed a range of training and learning activities throughout the fiscal year. We delivered three internal sessions focused on algorithmic impact assessments, the privacy implications of sharenting, and long-term privacy impacts of data breaches. Staff also attended virtually OCIO and IPC Ontario events exploring responsible use of AI in the public sector and health-care settings. Participation in IAPP sessions further enhanced staff knowledge of AI-related risks and governance. These activities collectively strengthened staff capacity to assess and respond to emerging technology issues.

Discussion of Results

We successfully advanced our strategic priority on emerging technologies by maintaining awareness of technological developments, identifying meaningful learning opportunities, and actively participating in targeted training. Through a combination of internal learning sessions and training offered across the public sector and professional networks, staff strengthened their capacity to understand and respond to the privacy, security, and ethical challenges posed by rapidly evolving technologies.

The knowledge gained through these internal and external education and training opportunities has been applied to the Office's advocacy and public education work. Staff used insights from learning opportunities to inform the development and refinement of key initiatives, including the creation of the Youth Privacy Resource Hub, guidance on the use of AI Scribe, and the design of a youth-focused educational series. These contributions ensured that the Office's outreach, guidance materials, and public education efforts reflect current technological realities and emerging privacy risks.

ADVOCACY AND COMPLIANCE

EDUCATION, TRAINING, AND OUTREACH

In 2025-2026, OIPC's Advocacy and Compliance branch spearheaded many initiatives aimed at education, training, and outreach throughout the year. Here are some of our engagement highlights.

We connected with municipalities, public body coordinators, and communities across the province through our outreach initiatives. For **Right to Know Week**, we created an "It's Your Right to Know!" poster, for display in library branches across Newfoundland and Labrador communities. In the month leading up to **Data Privacy Week**, the Commissioner sent an awareness letter to public body coordinators province-wide, along with our Privacy Principles Poster, featuring the CSA Model Principles, and our annual calendar highlighting key access and privacy dates. Following the municipal elections, we sent welcome letters to newly elected municipal officials, including Mayors, Deputy Mayors, and Councillors, reminding them of their responsibilities under ATIPPA, 2015 and directing them to our resources.



We published eight Newsletter issues! **Safeguard**, designed for custodians, and **Above Board** created for public bodies, were filled with practical and engaging content on all things access and privacy.



We launched two **surveys** designed to strengthen our resources and support meaningful engagement. We invited public bodies and custodians to share their insights on how we can make our publications more impactful and relevant. We also sought youth, feedback on privacy topics that matter most to them in an effort to help shape our future publications.

We shared our knowledge through presentations and speaking engagements both locally and across Canada. We collaborated with our counterparts from across the country at the **Annual FPT Meeting** and delivered PHIA presentations to Vida Nova Recovery and at the NL Massage Therapists Association's **Annual General Meeting**. We also spoke on access to information at the **Canadian Bar Association's Privacy and Access Law Conference**. The Commissioner connected with senior officials by presenting at the **Deputy Ministers' Breakfast**, where she provided an overview of the Office's mandate, priorities, and emerging areas of focus. The Commissioner also spoke at a **Special Joint Meeting** of the IAPP KnowledgeNet Chapters on Data Privacy Day, contributing to a discussion on the practical application of AI governance and its impact on organizations.



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 must submit the privacy assessment to OIPC for the Commissioner's review and comments. In addition to those PIAs required by statute to be submitted to us,

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.

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.

During 2025-2026 we concluded our consultation on the Royal Newfoundland Constabulary's PIA under PHIA, and we completed two consultations with the College of the North Atlantic under ATIPPA, 2015.

RESOURCES

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 2025-2026 our Office released the following new or updated resources.

ATIPPA, 2015 and PHIA
Guidance

For Public Bodies and Custodians

- Reasonable Safeguards – **NEW!**
- Assessing Privacy-Impactful Initiatives During Public Health Emergencies – **NEW!**

PHIA
Guidance

For Custodians

- AI Scribe – **NEW!**
- AI Scribe Self-Assessment – **NEW!**

ATIPPA, 2015
Guidance

For Public Bodies

- Privacy Impact Assessments: An Introduction to ATIPPA, 2015 Requirements **NEW!**

Access and Privacy Posters
Resources

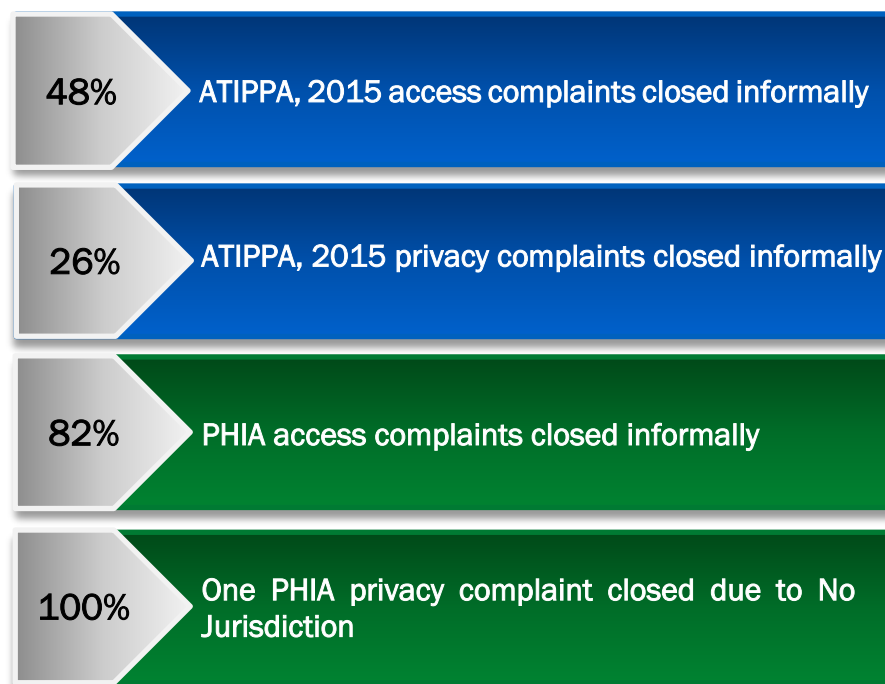
For the Public

- It's Your Right to Know! – **NEW!**

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 some complaints are concluded through the issuance of a Commissioner's Report, in 2025-2026 OIPC resolved many complaints informally.



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

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

- the complainant being satisfied after discussions with OIPC that what they were seeking is outside of the scope of the Act (eg answers to questions, creation of new records);
- 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;
- the public body or custodian acknowledging a privacy breach and agreeing to file a breach report with OIPC; 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 2025-2026, this Office issued 37 access reports that closed 40 investigation files (three reports closed two files each). There were no ATIPPA privacy reports. There were no access 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 2025-2026 we received several deemed refusal complaints and issued three reports on this topic, Reports [A-2025-030](#), [A-2025-037](#) and [A-2025-038](#). This is a decrease from previous reporting periods.

Reports A-2025-030 and A-2025-037 – Northern Peninsula Regional Service Board

These reports dealt with 3 separate deemed refusal complaints. In each case it was found that the public body was in clear violation of its legal obligations under the Act. This Office recommended that the public body respond to the requests, comply with statutory duties, apply for extensions when needed, undergo access and privacy training, and improve communications with this Office.

Section 13 – Reasonable Search

The duty to assist in 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.

The issue of reasonable search was addressed in 16 Reports, only two of which resulted in a recommendation that the public body conduct an additional search for records ([A-2025-036](#) and [A-2025-042](#)).

Report A-2025-024 – Department of Justice and Public Safety

In this Report the Commissioner commented on the issue of who needs to be satisfied that a reasonable search was conducted and concluded that it is this Office, and not the Complainant, that must be satisfied with the search.

Report A-2026-008 – Department of Social Supports and Well-Being

This Report notes that during the investigation it was determined that the original search for records was not sufficient. The Department then conducted an additional search for records, which did not ultimately result in locating any additional records. As a result of the additional search conducted by the Department, the Commissioner determined that a reasonable search had been conducted.

Report A-2025-042 – Department of Jobs, Immigration and Growth

In the Report it was determined that an attachment to a responsive record had not been provided to the Complainant. There was an issue with how the attachment had been saved and if the current version was the same as the one that had been attached to the email.

Regardless, this Office recommended that the current version of the attachment be located and provided to the Complainant.

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-2026-004 – Town of Bay Bulls

In response to the complaint the Town provided this Office with a copy of all the records, including those over which it claimed solicitor-client privilege. This greatly facilitated the investigation and allowed this Office to determine all but one record was properly withheld. The only record that had originally been withheld under section 30 that the Commissioner determined should be released was a document that had been tabled at a council meeting, which meant that privilege had already been waived.

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-2026-002 – Office of the Chief Medical Examiner (matter has proceeded to court)

The Complainant made an access request for records related to a deceased family member. The Office of the Chief Medical Examiner responded to the request by denying access to the majority of the records under section 24(1) of the **Fatalities Investigation Act**. The Commissioner found that there was a conflict between the **Fatalities Investigation Act** and ATIPPA, 2025. Due to the relevant sections of the **Fatalities Investigation Act** being included in Schedule A of ATIPPA, 2015, the **Fatalities Investigation Act** prevailed, and the Commissioner recommended that the public body maintain its position.

Report A-2026-007 – Commissioner for Legislative Standards (matter has proceeded to court)

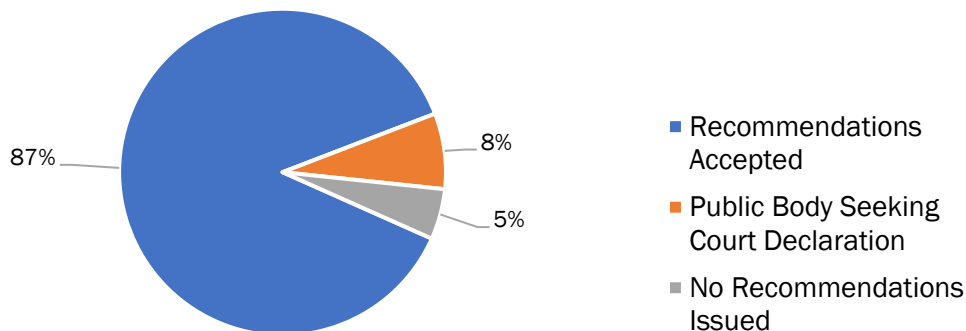
The Complainant made an access request to the Commissioner for Legislative Standards (“CLS”) for public disclosure statements and extra benefits statements about members of the House of Assembly. CLS made records available for inspection but refused to provide copies, citing provisions of the **House of Assembly Act**. This Report finds that there was a conflict between the House of Assembly Act and the **Access to Information and Protection of Privacy Act, 2015**. The conflict was resolved by section 7 of ATIPPA, 2015, as the provisions of the **House of Assembly Act** were not included in Schedule A of ATIPPA, 2015, so therefore ATIPPA, 2015 prevails. It was therefore recommended that the responsive records be provided to the Complainant.

COMPLIANCE

As noted above, this Office issued 37 reports in 2025-2026, all ATIPPA, 2015 access. There were no ATIPPA, 2015 privacy or PHIA related reports issued. 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 chart below illustrates how public bodies have responded to recommendations from this Office.

Public Body Response to ATIPPA, 2015 Access Reports



OIPC monitors public body 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. 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 2025-2026, public bodies made 1,089 applications for extensions of time for access to information requests. Of these, 731 were first time requests (where appropriate, this Office will consider multiple applications for the same access to information request). Also in this year, public bodies made 148 applications for approval to disregard access to information requests. This represents a slight decrease of 1% for time extension applications and an increase of 36% for disregard applications since last year.

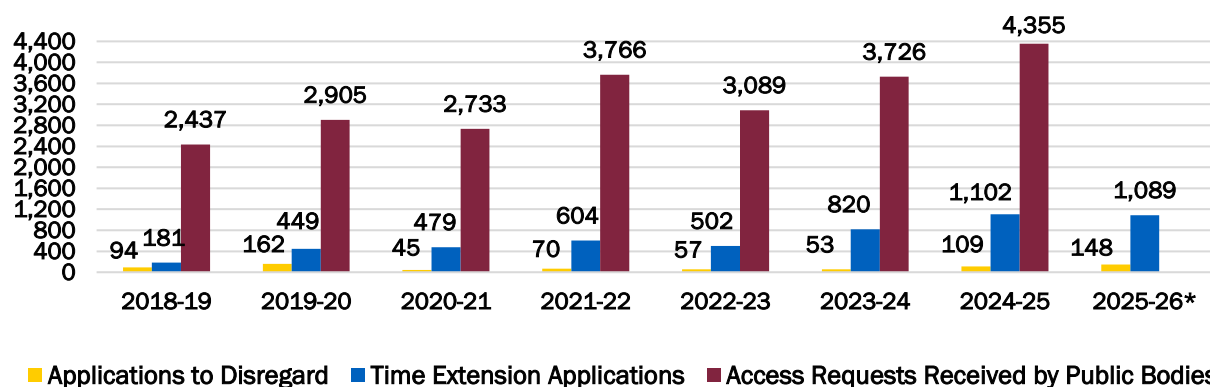
Of the 1,089 time extension applications, 990 (91%) were approved, 63 (6%) partially approved, 16 (1%) denied, and the remaining 20 (2%) were withdrawn by the public body. In total, across 1,069 applications (discounting those that were withdrawn), this Office approved 93% of additional time requested by public bodies.

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 and we have removed their ability to get the records they seek. A requester has a few options:

- 1) to appeal the public body's disregard of their request; or
- 2) re-submit an access request where request can be narrowed or done in a way to avoid a future disregard.

Given these consequences, a higher threshold for a disregard application applies. Of the 148 disregard applications, 101 (68%) were approved, 17 (12%) partially approved, 24 (16%) denied, and 6 (4%) were withdrawn by the public body.



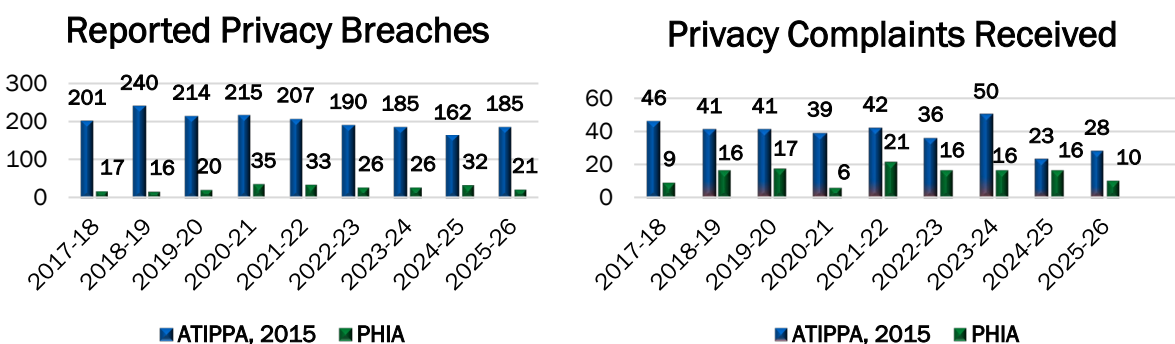
*2025-26 statistics for Access Requests Received by Public Bodies not yet published by the ATIPP Office.

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 2025-2026, public bodies reported 185 breaches to this Office under ATIPPA, 2015. In the same period, custodians reported 21 breaches under PHIA. These figures represent an

increase from the 162 breaches reported under ATIPPA, 2015 while there was a decrease from the 32 breaches reported under PHIA in 2024-2025.



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 intervenor, 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.

New and Ongoing Court Matters

Minister of Transportation and Infrastructure v. Kerry Hafield in her capacity as the Information and Privacy Commissioner of Newfoundland and Labrador, 2025 01G 4555

The Applicant requested access to the Government of Newfoundland and Labrador employee directory, including employee name, title, department, phone number, cell number, and email address. The Department granted access to the information with the exception of email addresses, which it withheld citing section 31(1)(l) and 35(1)(b), asserting that disclosure would reveal arrangements for the security of a computer system and harm the financial or economic interests of the government. The Applicant filed a complaint with the Commissioner, resulting in the issuance of Report A-2025-032 on August 11, 2025, in which the Commissioner found that the Department did not meet the required burden of proof to withhold the information, and the records were therefore recommended for release. On August 22, 2025, the Department filed an application for a declaration that it need not follow the Commissioner's recommendation. No date has yet been set for the hearing.

**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 under court file number 2022 01G 2003, and the matter was heard on February 11, 2025. A decision was rendered on April 29, 2025, in which the Court granted a declaration on both matters. The Court determined that, in accordance with the civil litigation standard, there was no requirement for it to review the information that was withheld under section 30(1)(a). The Commissioner has filed an appeal of that decision. The Office of Women and Gender Equality filed a cross appeal on the matter, as the Court had ordered disclosure of some information that had been withheld under section 29(1)(a). No hearing date has yet been set for the appeal.

Oleynik v. Memorial University, Various Court Files;
Oleynik v. Legal Appointments Board, 2022 01G 5032 (General Division);
Oleynik v. Independent Appointments Commission, 2023 01G 1907 (General Division);
Oleynik v. Kerry Hatfield, in her capacity as the Information and Privacy Commissioner of Newfoundland and Labrador, 2026 01H 0007 (Court of Appeal);

Oleynik v. John Hogan in his capacity as the Minister of Justice and Public Safety and Attorney General, 2024 01H 0048 (Court of Appeal);
Oleynik v. Neil Bose in his capacity as the President and Vice-Chancellor pro tempore of Memorial University of Newfoundland, 2024 01H 0050 (Court of Appeal); and
Oleynik v. Royal Newfoundland Constabulary et al., 2025 01H 0020 (Court of Appeal).

The Applicant has several matters before the Courts relating to decisions by public bodies in response to his access to information requests. These matters were on hold pending the Applicant's Application requesting Leave to Appeal to the Supreme Court of Canada of the Newfoundland and Labrador Court of Appeal's decision upholding the Applicant being declared a vexatious litigant.

On December 4, 2025, the Applicant's Application for Leave to Appeal was dismissed. The remaining matters continue to proceed through the Court of Appeal. Pursuant to the Vexatious Litigant Order the Applicant was required to obtain leave from the General Division before commencing new proceedings. Court of Appeal matters 2024 01H 0048, 2024 01H 0050, 2025 01H 0020, and 2026 01H 0007 are all appeals of the decision of the General Division to deny leave to the Applicant to proceed. These Appeals continue to proceed through the Court of Appeal.

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 hearing date has not been set.

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. The matter was heard on September 15, 2026. No decision has been rendered as of the date of this Report.

**Royal Newfoundland Constabulary v. OIPC, 2025 01G 0380;
Royal Newfoundland Constabulary v. OIPC, 2025 01G 0890; and
Serious Incident Response Team v. OIPC, 2025 01G 2998.**

The two RNC matters stem from access to information requests that subsequently were the subject of Commissioner's Reports A-2024-055 and A-2025-001 issued in the previous reporting period. The other matter arose in relation to Commissioner Report A-2025-022 which was issued in this reporting period. In the RNC matters, 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 the SIRT matter, SIRT relied on section 5(1)(n) to withhold records. In all three cases, the Commissioner found that the Public Bodies had not met the burden of proving that the information should be withheld from the requester, and therefore recommended disclosure. In all three cases, the RNC and SIRT made declaration applications seeking a ruling that they need not follow the Commissioner's recommendations. These matters have been consolidated, and a hearing is scheduled for January 15, 2027.

Kenneth Dicks v. Department of Health and Community Services, 2024 01G 6956

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 May 1st, 2026.

Court Decisions and Other Concluded Matters

Arts NL v. OIPC, 2023 01G 5365

The Applicant sought access to the names of peer assessors in each grant category for the spring and fall granting sessions of 2022. Arts NL withheld the information from the Applicant, citing sections 32 (confidential evaluations) and 40 (personal privacy). The Commissioner found in Report A-2023-042 that Arts NL had not established that the exceptions apply and recommended disclosure. Arts NL applied for a declaration of the Court pursuant to section 50 of ATIPPA, 2015 that it need not comply with the Commissioner's recommendations. The matter was heard on November 22, 2024, and a decision was rendered on November 7, 2025. The Court found that the information at issue was a list of names, not evaluative or opinion material, and therefore it was not subject to section 32. The Court further found that the peer assessors were employees of Arts NL for the purposes of section 40, and therefore disclosure of their names was deemed to not be an unreasonable invasion of privacy in accordance with section 40(2)(f). Arts NL's declaration application was denied and the information was ordered to be disclosed.

Memorial University v. OIPC, 2025 01G 2260

The Applicant sought access to the employment contract of the Associate Vice-President of Harlow and Global Partnerships. Memorial refused access, asserting that it does not have control or custody of the record and that the record is governed by the laws of the United Kingdom. The Applicant requested that the Commissioner review Memorial's decision. The Commissioner determined in Report A-2025-015 that Memorial has control and custody of the record and recommended disclosure. On April 3, 2025, Memorial applied for a declaration that it need not follow the Commissioner's recommendation, however on February 5, 2026, a consent order was filed in which Memorial withdrew its application and agreed to comply with the Commissioner's recommendation.

Kerry Hatfield in her capacity as the Information and Privacy Commissioner v. Northern Peninsula Regional Services Board, 2025 01G 3019

The Northern Peninsula Regional Service Board (NPRSB) failed to respond to multiple access requests, resulting in complaints to the Commissioner. In Report A-2025-018 the Commissioner found the NPRSB to be in clear violation of its obligations and made recommendations including that it respond to the requests within 20 business days. The NPRSB neither followed nor responded to the recommendations, which triggered section 49 of ATIPPA, 2015 in which a failure to either comply with the recommendations or file an application for a declaration means that the public body is considered to have agreed to comply with the recommendations. This allowed the Commissioner to file an order in accordance with section 51 of ATIPPA, 2015, which was done and served on the NPRSB on June 24, 2026. The NPRSB complied with the order, thus concluding the matter.

CONCLUSION

It is an honour to serve as the province's Information and Privacy Commissioner, and I commend the many individuals who contribute to the access and privacy system across Newfoundland and Labrador. From ATIPP coordinators, custodians, and municipal clerks to the technology professionals who help safeguard personal information, their dedication is essential to ensuring transparency, accountability, and privacy protection.

As we mark ten years of ATIPPA, 2015, we can reflect on a legislative framework that has helped position this province as a leader in access to information and privacy protection. This success is the result of the commitment and expertise of countless public servants and professionals who work diligently to uphold both the public's right of access and the protection of sensitive information where required by law.

I also extend my heartfelt thanks to the staff of OIPC. Their diligence, professionalism, and unwavering focus have been instrumental in carrying out our mandate and maintaining the careful balance between openness and the protection of information entrusted to public bodies.

While there is much to celebrate, the statistics presented in this Annual Report should also give us pause. Although the ATIPP Office has expanded its capacity in recent years, OIPC, smaller public bodies, and municipalities continue to face increasing demands with limited resources. As requests grow in volume and complexity, it is important that these organizations receive the support necessary to meet their responsibilities effectively and continue serving the public interest.

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
2025-2026 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
Department of Transportation and Infrastructure	Informal Resolution	2025-08-25	6			2025-09-03	6
Department of Environment, Conservation and Climate Change	Informal Resolution	2026-03-09	6			2026-03-17	6
Town of St. George's	Informal Resolution	2026-01-05	6			2026-01-13	6
Town of Norman's Cove-Long Cove	Informal Resolution	2025-10-07	8			2025-10-20	8
Memorial University	Informal Resolution	2026-01-29	9			2026-02-11	9
Memorial University	Informal Resolution	2025-09-02	13			2025-09-19	13
Department of Transportation and Infrastructure	Informal Resolution	2025-09-08	15			2025-09-29	15
Department of Transportation and Infrastructure	Informal Resolution	2026-01-26	15			2026-02-16	15
Royal Newfoundland Constabulary	Informal Resolution	2025-04-01	17			2025-04-25	17
Town of Hughes Brook	Informal Resolution	2025-05-06	17			2025-05-30	17
Treasury Board Secretariat	Informal Resolution	2025-10-10	19			2025-11-07	19
Town of St. George's	Informal Resolution	2025-12-29	19			2026-01-26	19
NL Health Services	Informal Resolution	2025-11-12	20			2025-12-10	20
Department of Transportation and Infrastructure	Informal Resolution	2025-07-04	22			2025-08-06	22
Royal Newfoundland Constabulary	Informal Resolution	2025-04-30	23			2025-06-03	23
Memorial University	Informal Resolution	2025-08-21	23			2025-09-24	23
Department of Education and Early Childhood Development	Informal Resolution	2025-06-16	25			2025-07-22	25
Memorial University	Informal Resolution	2025-12-12	26			2026-01-22	26
Department of Education	Informal Resolution	2025-04-07	27			2025-05-15	27
Department of Justice and Public Safety	Informal Resolution	2025-05-05	29			2025-06-16	29
Department of Justice and Public Safety	Informal Resolution	2026-01-20	29			2026-03-02	29
Department of Government Services	Informal Resolution	2025-12-01	30			2026-01-15	30
Executive Council	Informal Resolution	2025-09-10	30			2025-10-23	30
Department of Families and Affordability	Informal Resolution	2025-12-01	30			2026-01-15	30
Public Procurement Agency	Informal Resolution	2025-03-25	30	2025-05-07		2025-05-29	30
Department of Government Services	Informal Resolution	2025-12-01	31			2026-01-16	31
Department of Transportation and Infrastructure	Informal Resolution	2025-11-05	32			2025-12-22	32

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 Transportation and Infrastructure	Informal Resolution	2025-11-24	32	2026-01-12		2026-02-16	32
Department of Transportation and Infrastructure	Informal Resolution	2025-12-19	32			2026-02-06	32
Newfoundland and Labrador Housing Corporation	Informal Resolution	2025-08-04	34			2025-09-22	34
Human Rights Commission	Informal Resolution	2026-01-20	34			2026-03-09	34
Department of Education and Early Childhood Development	Informal Resolution	2025-11-19	35			2026-01-12	35
NL Health Services	Informal Resolution	2025-10-09	35			2025-12-01	35
Memorial University	Informal Resolution	2025-02-21	35			2025-04-11	35
Memorial University	Informal Resolution	2025-02-21	35			2025-04-11	35
Town of Torbay	Informal Resolution	2025-12-10	35			2026-02-02	35
Town of Marystown	Informal Resolution	2025-04-02	35			2025-05-23	35
Department of Health and Community Services	Informal Resolution	2025-09-19	36			2025-11-12	36
Department of Children, Seniors and Social Development	Informal Resolution	2025-06-05	36			2025-07-28	36
Department of Education and Early Childhood Development	Informal Resolution	2025-06-02	36			2025-07-23	36
Memorial University	Informal Resolution	2025-02-17	36			2025-04-08	36
Memorial University	Informal Resolution	2025-02-17	36			2025-04-08	36
Memorial University	Informal Resolution	2025-06-11	37			2025-08-05	37
Town of Bonavista	Informal Resolution	2025-06-20	37			2025-08-14	37
Executive Council	Informal Resolution	2025-08-29	38			2025-10-24	38
Memorial University	Informal Resolution	2025-02-17	38			2025-04-10	38
Memorial University	Informal Resolution	2025-09-22	38			2025-11-17	38
City of Corner Brook	Informal Resolution	2025-07-10	38			2025-09-04	38
Department of Education	Informal Resolution	2025-04-22	39			2025-06-17	39
Department of Fisheries, Forestry and Agriculture	Informal Resolution	2025-07-31	39			2025-09-25	39
NL Health Services	Informal Resolution	2025-08-14	39			2025-10-09	39
NL Health Services	Informal Resolution	2025-11-21	39			2026-01-20	39
Department of Justice and Public Safety	Informal Resolution	2025-11-04	40	2026-01-05		2026-01-14	40
NL Health Services	Informal Resolution	2025-10-08	40			2025-12-05	40

Public Body	Means of Resolution	Review Started	Days for Informal Review	Formal Review Started	Days for Formal Review	Date Complaint Resolved	Total Days
Memorial University	Informal Resolution	2025-03-28	40			2025-05-27	40
Town of Grand Falls-Windsor	Informal Resolution	2025-02-24	40			2025-04-22	40
City of St. John's	Informal Resolution	2026-01-06	41			2026-03-04	41
Department of Transportation and Infrastructure	Informal Resolution	2025-12-31	42			2026-03-02	42
Royal Newfoundland Constabulary	Informal Resolution	2025-02-12	42			2025-04-11	42
Royal Newfoundland Constabulary	Informal Resolution	2025-02-12	42			2025-04-11	42
NL Hydro	Informal Resolution	2025-12-05	42			2026-02-06	42
Royal Newfoundland Constabulary	Informal Resolution	2025-03-10	43			2025-05-09	43
Department of Fisheries, Forestry and Agriculture	Informal Resolution	2025-04-11	44			2025-06-16	44
Department of Education and Early Childhood Development	Informal Resolution	2025-08-07	46	2025-10-14		2025-10-14	46
Workplace NL	Informal Resolution	2025-09-19	46			2025-11-26	46
NL Health Services	Informal Resolution	2025-09-02	46			2025-11-06	46
City of Corner Brook	Informal Resolution	2025-03-18	46			2025-05-23	46
Town of Victoria	Informal Resolution	2026-01-13	46			2026-03-18	46
Town of Victoria	Informal Resolution	2026-01-13	46			2026-03-18	46
Town of Victoria	Informal Resolution	2026-01-13	46			2026-03-18	46
Department of Transportation and Infrastructure	Informal Resolution	2025-12-19	47			2026-02-27	47
Workplace NL	Informal Resolution	2025-03-07	47			2025-05-14	47
Town of Portugal Cove-St. Philip's	Informal Resolution	2025-04-29	47			2025-07-07	47
Commissioner for Legislative Standards	Informal Resolution	2025-12-22	47			2026-03-02	47
Department of Education	Informal Resolution	2025-02-18	49			2025-04-29	49
NL Health Services	Informal Resolution	2025-05-22	50			2025-08-04	50
City of St. John's	Informal Resolution	2025-06-17	50			2025-08-28	50
City of Corner Brook	Informal Resolution	2025-02-27	51			2025-05-12	51
Town of Deer Lake	Informal Resolution	2025-02-19	51			2025-05-02	51
Town of Victoria	Informal Resolution	2025-07-03	51	2025-09-16		2025-09-24	51
Department of Health and Community Services	Informal Resolution	2025-04-22	52	2025-07-07	9	2025-07-18	52

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 Environment and Climate Change	Informal Resolution	2025-04-30	56			2025-07-21	56
Workplace NL	Informal Resolution	2025-03-21	57			2025-06-12	57
NL Health Services	Informal Resolution	2025-09-24	57			2025-12-16	57
Department of Education and Early Childhood Development	Informal Resolution	2025-10-28	58			2026-01-22	58
Department of Health and Community Services	Informal Resolution	2025-08-14	59			2025-11-07	59
Department of Digital Government and Service NL	Informal Resolution	2025-02-24	59			2025-05-20	59
Town of Bonavista	Informal Resolution	2025-07-08	59			2025-10-01	59
Memorial University	Informal Resolution	2025-02-28	60			2025-05-27	60
Town of Portugal Cove-St. Philip's	Informal Resolution	2025-03-18	60			2025-06-12	60
City of Corner Brook	Informal Resolution	2025-05-20	61			2025-08-15	61
Department of Justice and Public Safety	Informal Resolution	2025-04-29	63			2025-07-29	63
Town of Gander	Informal Resolution	2025-02-04	65			2025-05-07	65
NL Hydro	Report	2025-11-17	22	2025-12-17		2026-01-23	22
Northern Peninsula Regional Services Board	Report	2025-05-01	23	2025-06-04		2025-06-18	23
Department of Social Supports and Well-Being	Report	2025-12-22	26	2026-01-30		2026-03-26	26
NL Hydro	Report	2025-07-09	26	2025-08-15		2025-09-04	26
Office of the Chief Medical Examiner	Report	2025-11-10	26	2025-12-17		2026-01-23	26
Department of Justice and Public Safety	Report	2025-08-27	29	2025-10-08		2025-11-28	29
Department of Justice and Public Safety	Report	2025-08-14	30	2025-09-26		2025-11-05	30
Department of Forestry, Agriculture and Lands	Report	2025-12-19	30	2026-02-04		2026-03-18	30
Memorial University	Report	2025-03-05	30	2025-04-16		2025-06-02	30
Executive Council	Report	2025-11-05	31	2025-12-19		2026-02-09	31
Department of Justice and Public Safety	Report	2025-03-03	32	2025-04-16		2025-05-27	32
Department of Justice and Public Safety	Report	2025-03-03	32	2025-04-16		2025-05-28	32
Department of Justice and Public Safety	Report	2025-05-26	32	2025-07-10		2025-08-27	32
Royal Newfoundland Constabulary	Report	2025-05-16	35	2025-07-08		2025-08-19	35
Office of the Premier	Report	2025-06-04	36	2025-07-25		2025-09-04	36
Northern Peninsula Regional Services Board	Report	2025-03-18	36	2025-05-08		2025-06-18	36
Department of Justice and Public Safety	Report	2025-08-15	37	2025-10-08		2025-11-18	37
Memorial University	Report	2025-09-05	37	2025-10-29		2025-12-01	37
City of St. John's	Report	2025-12-02	39	2026-01-29		2026-03-03	39

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	2025-03-12	41	2025-05-09		2025-05-28	41
Newfoundland and Labrador Legal Aid Commission	Report	2025-02-28	41	2025-04-29		2025-05-28	41
NL Hydro	Report	2025-08-21	45	2025-10-27		2025-11-05	45
Commissioner for Legislative Standards	Report	2025-12-22	45	2026-02-26		2026-03-25	45
Royal Newfoundland Constabulary	Report	2025-07-09	47	2025-09-16		2025-10-01	47
Memorial University	Report	2025-05-07	47	2025-07-15		2025-08-11	47
Department of Jobs, Immigration and Growth	Report	2025-07-03	48	2025-09-11		2025-10-06	48
Department of Jobs, Immigration and Growth	Report	2025-07-15	48	2025-09-23		2025-10-06	48
Town of Bay Bulls	Report	2025-11-20	48	2026-01-30		2026-02-20	48
NL Hydro	Report	2025-06-04	50	2025-08-15		2025-09-04	50
Serious Incident Response Team	Report	2025-02-03	50	2025-04-14		2025-05-06	50
Department of Transportation and Infrastructure	Report	2025-05-16	52	2025-08-01		2025-08-11	52
Department of Justice and Public Safety	Report	2025-05-28	53	2025-08-13		2025-08-29	53
Memorial University	Report	2025-07-24	53	2025-10-09		2025-10-22	53
Town of Torbay	Report	2025-01-31	54	2025-04-17		2025-05-05	54
Executive Council	Report	2025-03-03	59	2025-05-27		2025-06-04	59
Northern Peninsula Regional Services Board	Report	2025-06-09	60			2025-09-04	60
Executive Council	Report	2025-03-03	61	2025-05-29		2025-06-04	61
NL Hydro	Report	2025-09-22	63			2025-12-22	63
Memorial University	Report	2025-06-05	63	2025-09-05		2025-09-09	63
Royal Newfoundland Constabulary	Report	2025-05-21	65			2025-08-22	65
College of the North Atlantic	Declined to Investigate	2026-03-23	1			2026-03-24	1
Department of Digital Government and Service NL	Declined to Investigate	2025-05-06	45			2025-07-10	45
Public Procurement Agency	Declined to Investigate	2025-05-29	59			2025-08-22	59
Town of Stephenville Crossing	Determination on Costs	2026-01-30	23			2026-03-04	23
Town of Gander	Determination on Costs	2025-05-07	57			2025-07-29	57
Town of Victoria	Determination on Costs	2025-03-06	64			2025-06-06	64
Office of the Chief Information Officer	Formal Investigation not Conducted (s. 45)	2025-12-05	14	2025-12-29		2026-01-20	14
NL Health Services	Formal Investigation not Conducted (s. 45)	2025-11-24	23	2025-12-29		2026-01-23	23
NL Health Services	Formal Investigation not Conducted (s. 45)	2025-09-03	25	2025-10-08		2025-10-29	25

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 Victoria	Formal Investigation not Conducted (s. 45)	2025-11-20	25	2025-12-29		2026-02-05	25
NL Health Services	Formal Investigation not Conducted (s. 45)	2025-09-02	28	2025-10-10		2025-10-29	28
Office of the Premier	Formal Investigation not Conducted (s. 45)	2025-09-10	29	2025-10-22		2025-12-04	29
Department of Education and Early Childhood Development	Formal Investigation not Conducted (s. 45)	2025-10-27	31	2025-12-10		2026-01-21	31
Public Procurement Agency	Formal Investigation not Conducted (s. 45)	2025-07-15	31			2025-08-28	31
Office of the Premier	Formal Investigation not Conducted (s. 45)	2025-09-04	33	2025-10-22		2025-11-17	33
Department of Education and Early Childhood Development	Formal Investigation not Conducted (s. 45)	2025-10-23	33	2025-12-10		2026-01-21	33
Labour Relations Board	Formal Investigation not Conducted (s. 45)	2025-12-05	36	2026-01-29		2026-02-20	36
Town of Victoria	Formal Investigation not Conducted (s. 45)	2025-11-24	36	2026-01-16		2026-02-12	36
NL Health Services	Formal Investigation not Conducted (s. 45)	2025-05-15	38			2025-07-10	38
Department of Transportation and Infrastructure	Formal Investigation not Conducted (s. 45)	2025-11-19	42			2026-01-21	42
Department of Finance	Formal Investigation not Conducted (s. 45)	2025-03-18	42			2025-05-16	42
Town of Salmon Cove	Formal Investigation not Conducted (s. 45)	2025-03-31	43	2025-06-02		2025-06-26	43
Town of Salmon Cove	Formal Investigation not Conducted (s. 45)	2025-03-31	43	2025-06-02		2025-06-26	43
Department of Justice and Public Safety	Formal Investigation not Conducted (s. 45)	2025-05-02	47			2025-07-10	47
Public Procurement Agency	Formal Investigation not Conducted (s. 45)	2025-05-16	48			2025-07-25	48
Town of Bonavista	Formal Investigation not Conducted (s. 45)	2025-08-14	48	2025-10-23		2025-12-09	48
Public Procurement Agency	Formal Investigation not Conducted (s. 45)	2025-03-25	49			2025-06-04	49

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 Portugal Cove-St. Philip's	Formal Investigation not Conducted (s. 45)	2025-04-04	51	2025-06-18		2025-07-08	51
Municipal Assessment Agency	Formal Investigation not Conducted (s. 45)	2025-07-02	57	2025-09-23		2025-09-26	57
Department of Industry, Energy and Technology	Formal Investigation not Conducted (s. 45)	2025-05-16	58	2025-08-11		2025-08-20	58
Department of Families and Affordability	Formal Investigation not Conducted (s. 45)	2025-09-08	58	2025-12-01		2025-12-05	58
Town of Marystown	Formal Investigation not Conducted (s. 45)	2025-07-16	58	2025-10-08		2025-10-20	58
Northern Peninsula Regional Services Board	Formal Investigation not Conducted (s. 45)	2025-09-10	60			2025-12-05	60
Department of Fisheries, Forestry and Agriculture	Formal Investigation not Conducted (s. 45)	2025-02-12	61			2025-05-09	61
Northern Peninsula Regional Services Board	Formal Investigation not Conducted (s. 45)	2025-10-09	63			2026-01-13	63
Northern Peninsula Regional Services Board	Formal Investigation not Conducted (s. 45)	2025-10-08	64			2026-01-13	64
Northern Peninsula Regional Services Board	Formal Investigation not Conducted (s. 45)	2025-10-08	64			2026-01-13	64
Royal Newfoundland Constabulary	Formal Investigation not Conducted (s. 45)	2025-02-03	65			2025-05-06	65
Town of Botwood	Formal Investigation not Conducted (s. 45)	2025-09-18	65			2025-12-22	65
Town of Hughes Brook	Formal Investigation not Conducted (s. 45)	2025-06-04	65			2025-09-08	65
Royal Newfoundland Constabulary	No Jurisdiction	2026-01-14	0			2026-01-14	0
Royal Newfoundland Constabulary	No Jurisdiction	2026-01-14	0			2026-01-14	0
Municipal Assessment Agency	No Jurisdiction	2025-10-03	0			2025-10-03	0
Public Procurement Agency	No Jurisdiction	2025-05-22	0			2025-05-22	0
Northern Peninsula Regional Services Board	No Jurisdiction	2025-10-21	0			2025-10-21	0
NL Health Services	No Jurisdiction	2025-11-07	0			2025-11-07	0
Town of Clarendville	No Jurisdiction	2026-03-03	0			2026-03-03	0
Citizens' Representative	No Jurisdiction	2026-01-06	0			2026-01-06	0
NL Health Services	No Jurisdiction	2026-02-17	1			2026-02-18	1
Town of Torbay	No Jurisdiction	2025-11-06	1			2025-11-07	1
Department of Families and Affordability	No Jurisdiction	2025-07-22	2			2025-07-24	2
Arts NL	No Jurisdiction	2026-02-13	2			2026-02-17	2

Public Body	Means of Resolution	Review Started	Days for Informal Review	Formal Review Started	Days for Formal Review	Date Complaint Resolved	Total Days
NL Health Services	No Jurisdiction	2025-12-31	4			2026-01-07	4
Bonavista Historic Townscape Foundation	No Jurisdiction	2026-01-06	12			2026-01-22	12
Town of Victoria	No Jurisdiction	2025-10-08	22			2025-11-10	22
Bonavista Historic Townscape Foundation	No Jurisdiction	2025-12-08	30			2026-01-22	30
Town of Cupids	Withdrawn	2025-12-05	0			2025-12-05	0
Workplace NL	Withdrawn	2025-08-25	4			2025-08-29	4
Service NL	Withdrawn	2026-01-22	19			2026-02-18	19
City of St. John's	Withdrawn	2025-03-20	51			2025-06-03	51

Appendix C

**Timelines (business days) for Privacy Complaints for the
2025-2026 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
City of St. John's	Informal Resolution	2025-10-08	2025-11-06	21
Treasury Board Secretariat	Informal Resolution	2025-06-05	2025-09-25	80
Department of Education and Early Childhood Development	Informal Resolution	2025-06-25	2025-11-14	99
Royal Newfoundland Constabulary	Informal Resolution	2025-04-09	2025-12-05	172
Department of Children, Seniors and Social Development	Informal Resolution	2025-02-20	2026-01-12	226
Treasury Board Secretariat	Informal Resolution	2024-10-22	2025-09-22	233
Public Service Commission	Formal Investigation not Conducted (s. 75)	2025-06-09	2025-06-12	3
Department of Education	Formal Investigation not Conducted (s. 75)	2025-03-24	2025-06-05	51
NL Schools	Formal Investigation not Conducted (s. 75)	2025-02-07	2025-06-05	84
Department of Transportation and Infrastructure	Formal Investigation not Conducted (s. 75)	2025-09-24	2026-03-02	110
City of St. John's	Formal Investigation not Conducted (s. 75)	2025-06-05	2025-12-05	131
Town of Victoria	Formal Investigation not Conducted (s. 75)	2025-07-16	2026-01-27	139
Workplace NL	Formal Investigation not Conducted (s. 75)	2024-09-09	2025-11-13	308
Royal Newfoundland Constabulary	Formal Investigation not Conducted (s. 75)	2024-03-07	2025-11-25	447
Department of Justice and Public Safety	Formal Investigation not Conducted (s. 75)	2023-05-31	2025-07-03	536
Town of Bauline	Formal Investigation not Conducted (s. 75)	2022-08-15	2025-11-28	859
Department of Government Services	No Jurisdiction	2026-03-16	2026-03-25	7
Town of New-Wes-Valley	No Jurisdiction	2025-08-21	2025-09-04	10
Workplace NL	No Jurisdiction	2025-10-17	2025-11-06	14

Public Body	Means of Resolution	Review Started	Date Complaint Resolved	Total Days
Office of the Chief Information Officer	No Jurisdiction	2025-07-28	2025-09-04	28
Royal Newfoundland Constabulary	No Jurisdiction	2025-07-25	2025-09-04	29
NL Schools	Withdrawn	2025-05-12	2025-09-15	90
Town of Grand Falls-Windsor	Withdrawn	2023-04-05	2025-04-01	519

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