

FOIPPA TOOLKIT: DEALING WITH EXTERNAL AND INTERNAL CONFLICTS

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I. INTRODUCTION

For anyone working in local government, an additional layer of consideration exists with your work products and communications, being your duties under the *Freedom of Information and Protection of Privacy Act* (“FOIPPA”). Under FOIPPA, public bodies (such as local governments) have obligations to fulfill requests for information made under FOIPPA (referred to in this paper as “access requests”, “FOI requests” or “requests”), as well as obligations to safeguard personal information and other confidential information. When it comes to processing access requests, this already challenging work can be further complicated by bad apples both inside and outside the organization, from applicants submitting vexatious requests to members within the organization blatantly disregarding their duties under FOIPPA.

This paper provides an overview of some common external and internal conflicts surrounding FOIPPA processes and obligations. Regarding external conflicts, we first identify some key responsibilities in navigating and fulfilling FOI requests that may come to a head when dealing with difficult applicants. We then discuss applications to the Office of the Information and Privacy Commissioner (the “OIPC”) to disregard FOI requests in prescribed circumstances, outlining the grounds on which such an order may be granted, the circumstances that might lead to a successful section 43 application, and the kind of evidence that is necessary to meet this very high threshold. Regarding internal conflicts, we discuss the proper recourse where staff or elected officials fail to adhere to their obligations under FOIPPA, including where privacy is breached or where records are not provided in response to an access request, whether intentionally or not.

II. EXTERNAL CONFLICTS & COMMON DIFFICULTIES WITH APPLICANTS

Before discussing some common difficulties faced with applicants, it is important to highlight some of the fundamental elements of the FOI request process.

FOIPPA provides a very broad right to all persons to request information held by a public body, with the stated purpose of the Act being, in part, to “make public bodies more accountable to the public [...] by giving the public a right of access to records” (section 2(1)(a)).

Section 4(1) of FOIPPA provides that any person “has a right of access to a record in the custody or under the control of a public body”. The term “record” is defined in FOIPPA to include anything on which information is recorded or stored, as including:

“books, documents, maps, drawings, photographs, letters, vouchers, papers and any other thing on which information is recorded or stored by graphic, electronic, mechanical or other means, but does not include a computer program or any other mechanism that produces records”.

Given this definition, it is important to remember that “records” refer not only to traditional documents we may think of as records (reports, plans, meeting minutes etc.), but much more broadly to essentially any recorded information, from audio and video recordings, emails, text messages on work devices, and much more.

The terms “custody” and “control” likewise cast a broad net. “Custody” generally refers to having physical possession of a record (including digitally), while “control” refers to records that may not be in a public body’s possession but nonetheless relate to the public body’s business, and of which the public body has some authority over or could reasonably expect to obtain a copy of the record on request.

There are a number of important limits on this general right to access, however, such as:

- The applicant must provide enough detail in their access request to enable an experienced employee of the public body, with a reasonable effort, to identify the record sought, per section 5(1)(a) of FOIPPA;
- The applicant may first be required to pay fees associated with the access request (as long as the fees charged are at the rate prescribed under FOIPPA and its regulation, and a fee estimate was provided), per section 75 of FOIPPA;
- Before being released to the applicant, records will be severed in accordance with the exceptions set out in Part 2, Division 2 of FOIPPA; and
- Certain types of records, set out in sections 3(3) and (5) of FOIPPA, such as court records and records that are available for purchase by the public, are not subject to access requests.

A. Common Sources of Conflict

Given this broad right of access under FOIPPA, it is perhaps unsurprising that some applicants make use of this system in a manner that is burdensome on local governments. Common points of friction that can arise with applicants include the following:

- Frequent requests: there is no explicit limit to the number of access requests a given applicant may make. So long as the applicant is willing to pay any fees that are validly charged under section 75 of FOIPPA, and they provide a sufficient level of detail to allow their request to be processed (per section 5(1)(a) of FOIPPA), then an applicant may make as many access requests as they choose. This may take the form of multiple requests submitted simultaneously, or an ongoing pattern of requests over time. Unless the frequency, volume or intent of the requests reach a level which meets the high threshold of section 43 (discussed further below), a public body must process all FOI requests made by an applicant, in accordance with the various requirements of FOIPPA, regardless of their frequency.

- Broad requests: there is also no explicit limit to the breadth of request an applicant may make, and applicants may make requests that require a vast search and result in a high volume of responsive records. Applicants must clarify the nature and wording of the request if the public body finds it too ambiguous to process, but unless the request is so broad as to meet the threshold of an “excessively broad” request under section 43 of FOIPPA, the request must be processed.
- Refusal to narrow or clarify request: if an applicant makes a request that is too ambiguous to process, a public body may seek clarification of that request. The applicant may, however, refuse to modify the wording of their request, or to further explain the request. In this event, the public body must consider whether it is possible to process the request in its extant form, and if not, how to carefully document and communicate to the applicant why the request cannot be processed.
- Arguing against paying fees: in the event that a public body charges a fee under section 75 for an access request, the applicant may contest that fee. Conflict around fees will usually take one of two forms: the applicant contests the public body’s fee estimate, arguing the amount is higher than what is permitted under FOIPPA and its regulations; or the applicant and the public body take different positions on the applicant’s entitlement to a fee waiver under section 75(5). If an applicant contests fees, the public body must consider whether to reduce the fee estimate, waive the fees in whole or in part, or stick with the initial fee estimate. If the public body maintains its original fee estimate, the applicant may seek review of this decision with the OIPC.
- Repeated complaints to the OIPC: despite a public body’s best efforts to fulfill all its obligations under FOIPPA when processing FOI requests, some applicants may repeatedly take issue with the public body’s responses, and seek constant review by the OIPC. Reviews may be sought in relation to a number of elements of the FOI process: the timeliness of the responsive records being provided to the applicant; the adequacy of the search for records; and the appropriateness of the fees charged. However, the most common cause for complaint is the applicant contesting a public body’s authority to withhold information that has been redacted in the records.

B. Local Government Responsibilities

With these common sources of conflict in mind, it is important to consider some of the core responsibilities incumbent on public bodies when fulfilling FOI requests. Ensuring you have a firm handle on your FOIPPA responsibilities will both help avoid proactively conflict with applicants where possible and, in the event that an applicant seeks review by the OIPC, will help clearly establish that the public body has complied with FOIPPA.

Three key responsibilities under FOIPPA to be mindful of are: (1) the duty to assist; (2) statutory time limits for responding to access requests; and (3) the requirement to provide a fee estimate where fees are imposed.

1. Duty to Assist

Section 6(1) of FOIPPA states that the “head of a public body must make every reasonable effort to assist applicants and to respond without delay to each applicant openly, accurately and completely”. The OIPC has issued a number of decisions and reports which outline what is required to meet this duty.

In Order No. 30-1995, Commissioner Flaherty described making “every reasonable effort” as:

“an effort which a fair and rational person would expect to be done or would find acceptable. The use of ‘every’ indicates that a public body’s efforts are to be thorough and comprehensive and that it should explore all avenues in verifying the accuracy and completeness of the personal information.”

In the OIPC’s Audit and Compliance Report F18-16, 2016 BCIPC 21, the OIPC notes that the duty to assist “does not impose a standard of perfection but it is a serious and meaningful legal duty. It is not merely aspirational”.

In the OIPC’s Audit and Compliance Report F16-01, 2016 BCIPC 32, the OIPC highlighted four main categories of activities which form the part of the duty to assist: (1) documentation of files and searches; (2) timing of responses; (3) content of responses; and (4) communications with applicants.

In carrying out its duty to assist, it is crucial that a public body clearly document its search for responsive records. This may include noting the potential sources of records, the sources of records which were searched, the methods used to conduct the search, and in the event that no responsive records are located for a specific access request, an explanation as to why this is the case. A clear documentation of the search process will both assist in identifying if there were any gaps in the process that should be addressed before sending the records to the applicant, and provide evidence of the sufficiency of the search in the event that an applicant seeks a review by the OIPC.

Communications with an applicant should also be clearly documented, particularly where clarification is sought as to the wording or scope of a given FOI request. If there is any ambiguity as to the scope or intent of an applicant’s request, it is always preferable to attempt to clarify the request with the applicant, rather than presume the scope of the request. It is imperative that a public body does not take a narrow reading of an applicant’s request without first seeking to clarify the scope of the request, lest the applicant claim that the public body did not adequately fulfill their request.

2. Time Limit for Responding

Responding to access requests in a timely fashion is both a component of the duty to assist, as noted above, and a standalone requirement under section 7 of FOIPPA. Per section 7(1), a public body must fulfill an FOI request no later than 30 days after receiving the request. It should be noted that the word “day” is defined in FOIPPA as not including holidays or Saturdays (and that the word “holiday” is further defined in the *Interpretation Act* to include Sundays).

While there are certain scenarios, discussed below, in which this 30-day time limit may be extended, a public body should approach each request being prepared for the likely possibility that it must be responded to within 30 days.

3. Fee Estimates

If you intend to charge an applicant a fee in relation to their access request, you are required to first provide the applicant with a written estimate of the total fees, per section 75(4) of FOIPPA. Fees may only be charged in relation to the services listed in section 75(1), and only charged at the rates prescribed in the FOIPPA regulation. The fee estimate must be provided to the applicant prior to the services being provided, per section 75(4)(a). It is also important that fee estimates do not include charges for services or information that are not subject to fees, such as the first three hours spent processing a request; time spent severing information from a record; or for a request for an applicant’s own personal information.

C. Limits on Local Government Responsibilities

While it is imperative that public bodies meet the FOIPPA duties discussed above, it is also important to be aware of limits and caveats to those responsibilities. Particularly where applicants may pressure a public body to process a request on an unreasonable timeline, or contest a reasonable fee estimate, it is valuable for a public body to know where it can draw the line while still complying with its FOIPPA obligations.

1. Recourse for Addressing Unmanageable Time Limits

Section 10 of FOIPPA sets out circumstances where a public body may extend the time limit for responding to an access request. Per section 10(1), an access request may be extended for up to 30 days if one or more of the following apply:

- The applicant does not give enough detail to enable the public body to identify a requested record;
- A large number of records are requested or must be searched and meeting the time limit would unreasonably interfere with the operations of the public body;

- More time is needed to consult with a third party or other public body before the head can decide whether or not to give the applicant access to a requested record;
- The applicant has consented, in the prescribed manner, to the extension.

It is important to note that, if a public body determines that any of subsections 10(1)(a) – (d) apply, they may unilaterally inform the applicant that an extension is being applied to the request. This does not require approval by the OIPC or any other party.

If the public body requires further time beyond the initial 30-day extension, it may apply to the OIPC for a further extension, per section 10(2). Generally, this further extension is requested in relation to one of the scenarios in subsections 10(1)(a) – (d) continuing to apply, though the OIPC may provide a further extension on other grounds if they deem it fair and reasonable to do so, per section 10(2)(b).

If you are dealing with a request that results in hundreds or thousands of pages of responsive records, it is worth considering applying for a further extension under section 10(2) if the initial timeline is unmanageable. Likewise, where extensive communications with affected third parties is required (particularly where the records contain the records of multiple third parties), consider whether a further extension under section 10(2) may be necessary.

2. Discretion in Handling Fee Disputes

An applicant may request that a fee issued under section 75(1) be waived in whole or in part. While an applicant may be insistent that the fee not apply to them, it is ultimately the public body's discretionary decision as to whether or not a fee should be waived. This discretion must be exercised reasonably, but a public body is not required to waive a fee just because a difficult applicant insists upon it. Per section 75(5) of FOIPPA, a public body may waive a fee where, in the public body's opinion:

- The applicant cannot afford the payment or for any other reason it is fair to excuse payment, or
- The record relates to a matter of public interest, including the environment or public health or safety.

If an applicant has made a request for a fee to be waived, the public body must respond in writing to that request within 20 days of receiving the fee waiver request.

In the event that a public body elects to not grant a fee waiver, an applicant may seek review with OIPC of this decision. As such, the public body will want to ensure that it can justify its reasoning that the circumstances in section 75(5) of FOIPPA do not apply.

III. SECTION 43 – APPLYING TO THE OIPC TO DISREGARD A REQUEST

When faced with the most extreme cases of unmanageably large and constant requests, or applicants who appear to be making requests in bad faith, public bodies should consider whether to seek authorization from the OIPC to disregard the FOI request or requests in question. Under section 43 of FOIPPA, the OIPC may authorize a public body to disregard a request if the request in question meets one of the grounds in sections 43(a)-(c).

Section 43 of FOIPPA is remedial in nature, granting the Commissioner a right to curb abuse of the right of access granted by the Act. It is an important tool in the comprehensive FOIPPA scheme, and is therefore to be given a “remedial and fair, large and liberal construction and interpretation as best ensues the attainment of its objects” (*Crocker v. British Columbia (Information and Privacy Commissioner)*, 1997 CanLII 4406 (BCSC) at 32). The courts have interpreted the remedial nature of this section to include the power for the OIPC to provide prospective relief by also limiting future requests, such as by limiting an applicant to one pending access request at a time for a period of a year.

The OIPC is cautious in exercising its power under this section, noting that “authority under s. 43 should be exercised after careful consideration since it can limit or take away a person’s statutory right to access information” (Order F24-02, 2024 BCIPC 2 at 7). In order to successfully be granted an order to disregard a request under section 43, a public body must demonstrate that one or more of the following apply:

- The request is frivolous;
- The request is vexatious;
- The records in question were previously disclosed to the applicant, or are otherwise accessible to them;
- The request is overwhelmingly broad (to the point of interfering with the public body’s operations);
- The request is systematic (to the point of interfering with the public body’s operations); or
- The request is repetitious (to the point of interfering with the public body’s operations).

A. Frivolous or Vexatious Requests

Section 43(a) allows the OIPC to authorize the disregarding of a request if “the request is frivolous or vexatious”. The OIPC has found that frivolous or vexatious requests are requests made for a purpose other than a genuine desire to access information.

Frivolous requests are requests which are trivial or not serious, such as where the request was for documents the applicant themselves had written and sent to the public body (Order F13-18, 2013 BCIPC No 25). Vexatious requests are requests made for an ulterior motive unrelated to a genuine interest in accessing the requested information, such as trying to pressure a public body towards changing or making a decision (Order F13-16, 2013 BCIPC 20); harassing the public body (Order F13-18, 2013 BCIPC 25); using the FOI request process as a way to criticize or express displeasure with the public body (Order F20-15, 2020 BCIPC 17); or, intentionally aiming to burden or cause hardship for an employee of the public body (Order F19-44, 2019 BCIPC 50).

A core element of frivolous or vexatious requests is the intent of the applicant. The public body must be able to provide evidence that the applicant was motivated by a purpose other than a genuine desire to access the information responsive to their FOI request. Clear documentation of staff interactions with the applicant where the applicant expresses an intent other than a bona fide interest in the requested records will help provide evidence further down the line to the OIPC of any frivolous or vexatious motives.

B. Requests for Records Previously Disclosed or Otherwise Accessible

Section 43(b) allows the OIPC to authorize the disregarding of a request if “the request is for a record that has been disclosed to the applicant or that is accessible by the applicant from another source”. This is the newest ground available under section 43, being added to FOIPPA in November 2021. While there are fewer OIPC decisions considering this section as a result, there is nonetheless still some guidance as to when this subsection may or may not apply.

In order for section 43(b) to apply, the records for the access request must be exactly the same as records previously released or otherwise available to the applicant. Similar or partially overlapping records will not be sufficient (see Order F22-59, 2022 BCIPC 67). In order to prove that the public body had previously provided copies of the same records that are now subject to another FOI request from the same applicant, “the public body needs to identify and provide details about when and how that access was previously given” (Order F25-64, 2025 BCIPC 74 at 93).

In order for records to be “accessible by the applicant from another source”, it must be demonstrated the applicant can, in practical reality, gain access to records through that alternative means. The OIPC has held that this section did not apply in a circumstance where an applicant would usually have access to records by an alternative source, but was currently restricted from pursuing that source by a pre-existing OIPC order (Order F25-07, 2025 BCIPC 7 at 52).

Similarly, section 43(b) will not apply if alternative disclosure, such as through a court proceeding, is merely possible. The OIPC found that section 43(b) did not apply in a circumstance where the applicant had a pending petition against the public body in question, as “the related court proceeding in this matter has not reached a stage where the extent of

disclosure is known, nor have the parties exchanged any records” (Order F25-47, 2025 BCIPC 55 at 44).

C. Excessively Broad Requests

Section 43(c)(i) allows the OIPC to authorize the disregarding of a request that “is excessively broad” to the point of interfering with the public body’s operations, with the core consideration being the volume of responsive records the request would generate. A request is excessively broad when it generates a volume of responsive records that can be fairly characterized as “overwhelming” or “inordinate” (Order F23-98, 2023 BCIPC 114 at 39). While the test for “excessively broad” is more conceptually straightforward than other sections – being premised primarily on the volume of records produced by request – there is still nuance in determining whether a request meets this standard.

A request may be excessively broad on its face, based on the breadth of the wording, such as a request to a Provincial Ministry for “all emails to government” (Order F23-98, 2023 BCIPC 114 at para 40). Other requests may require the public body first conduct a preliminary search for records to obtain an estimate of the number of responsive records in order to demonstrate that the request would produce an “overwhelming” or “inordinate” number of records.

The OIPC does not have a set numerical threshold for what volume of responsive records would be “overwhelming” or “inordinate”, but previous orders have found that requests that would result in 10,000, 17,000 and 209,150 pages of responsive records were excessively broad (Order F24-92, 2024 BCIPC 105 at para 22; Order F25-39, 2025 BCIPC 47 at para 24; Order F25-41, 2025 BCIPC 49 at paras 16-20). While these past decisions are instructive to a degree, one should apply caution when using them as a benchmark for when a request is excessively broad: the OIPC will consider the breadth of the request in its specific context (the nature of the records, the wording of the request, the size and resources of the public body), so a page number that may be “inordinate” in one circumstance may not be in another.

D. Repetitious or Systematic Requests

Section 43(c)(ii) allows the OIPC to authorize the disregarding of a request that “is repetitious or systematic”. Unlike frivolous or vexatious requests, where the applicant’s motivation is the key consideration, here the applicant’s motive is secondary to the pattern of the requests themselves.

Systematic requests are requests made in accordance with a method or plan that the applicant is engaged in. The OIPC has established a list of characteristics of systematic requests, which may include:

- A pattern of requesting more records, based on what the respondent sees in records already received;
- Combing over records deliberately in order to identify further issues;

- Revisiting earlier freedom of information requests;
- Systematically raising issues with the public body about their responses to freedom of information requests, and then often taking those issues to review by OIPC;
- Behaviour suggesting that a respondent has no intention of stopping the flow of requests and questions, all of which relate to essentially the same records, communications, people and events; and
- An increase in frequency of requests over time (Order F25-75, 2025 BCIPC 88 at 47).

A request does not need to demonstrate all these characteristics in order to be deemed systematic, so long as the public body can prove in general that the request was made in accordance with a specific methodology used by the applicant. However, proving these characteristics can be key in establishing that the applicant is making FOI requests in accordance with a specific method, and are helpful indicators for the public body when considering whether to make an application under section 43.

Repetitious requests are requests made more than once. The OIPC has found that requests for similar or related information are not enough for a request to be repetitious. The request must be essentially for the same information as a previous request (though the wording of the request does not need to be strictly identical).

In order to successfully prove a request is systematic or repetitious, it is important to have evidence of the applicant's other FOI requests, including prior requests which are not themselves part of the section 43 application, but which help establish an overall pattern in the applicant's behaviour. The OIPC will still assess each access request individually before determining whether it can be disregarded, but when assessing whether a request is systematic or repetitious, it is necessary for the OIPC to view each individual request in the context of the wider pattern of requests.

E. Unreasonable Interference with the Operations of a Public Body

Demonstrating that a request is frivolous, vexatious, or for records that have already been disclosed or are otherwise accessible to an applicant is sufficient to be successfully granted permission to disregard a request. On the other hand, demonstrating that a request is excessively broad, systematic or repetitious is only the first half of successfully demonstrating that section 43(c) applies. A public body must also show that fulfilling the FOI request would unreasonably interfere with the public body's operations; a highly contextual and fact-based exercise.

What will be considered "unreasonable interference" will vary depending on the size and nature of the public body in question. For example, the OIPC will consider what impact

responding to the request(s) subject to the section 43 application would have on the rights of other access applicants, and the OIPC is likely to find that a public body's operations have been unreasonably interfered with if responding to the subject requests would limit other persons' right to access records.

Given the contextual nature of this analysis, clear evidence is particularly essential to succeeding in an application under section 43(c). The OIPC will look for specific evidence of actual impacts on the public body's operations, rather than general assertions (Order F25-75, 2025 BCIPC 88). This is another area in which clear and consistent documentation is key. Ensure that you document elements such as the steps staff have taken to fulfill the access request; the time and resources required to fulfill the request; the time spent on the section 43 applicant's request in contrast to other applicants; and the impact of managing the FOI requests on staff's ability to manage their other duties.

IV. INTERNAL CONFLICTS

Unfortunately, privacy and FOI difficulties don't arise solely from outside the local government. FOI Heads and other privacy staff members are often faced with conflicts originating from within their organization, when their co-workers, supervisors or locally elected officials are non-compliant with FOIPPA. This is often where someone fails to search or provide responsive records within the statutory timeline (or even at all), or where a third party's personal privacy is breached.

A. Privacy Breaches

In the case of a privacy breach, FOIPPA is clear on the proper recourse. The FOI Head must contain the breach and notify all affected individuals, without unreasonable delay, as well as the OIPC. Per section 36.3 of FOIPPA, a public body is statutorily required to notify the OIPC and the individuals impacted by the breach where the breach could reasonably be expected to result in significant harm to the individual. However, even if the public body is unsure as to whether the breach has risen to the level of reasonably being expected to cause significant harm, it is often prudent to notify the OIPC regardless. The OIPC will ensure the breach is properly documented, evaluate the risks posed by the breach, verify adequate containment measures have been taken and confirm all required notifications went out. In the case of a bad apple, the OIPC may initiate a formal investigation and issue recommendations or requirements for improved practices, or, in more serious cases, a formal report or ruling on the incident. We note that the OIPC's binding orders can only be challenged through judicial review in the BC Supreme Court.

The OIPC can also refer egregious cases to Crown Counsel for prosecution. Deliberate non-compliance, such as knowingly concealing, withholding, falsifying, or destroying records sought under FOIPPA, is an offence punishable by fines up to \$50,000 for individuals and \$500,000 for corporations (i.e., the local government itself). While this has only been done on one occasion, it serves as a useful reminder that although the FOI Head is responsible for ensuring the local

government's overall compliance with FOIPPA, neither they nor the local government will be penalized where an internal actor is non-compliant with FOIPPA or the local government's privacy policies and directions.

B. Failure to Provide or Concealment of Records

The recourse is less clear when dealing with someone's refusal to provide records in response to an access request, or even conceal such records. As discussed above, the FOI Head is required under section 6(1) of FOIPPA to "make every reasonable effort to assist applicants and to respond without delay to each applicant openly, accurately and completely". To do so, they will direct relevant individuals within the local government to search for and gather responsive records, and provide those back within a certain timeframe. The OIPC describes best practices for public bodies in this regard as follows:

- Provide training and guidance on the appropriate steps for searching for responsive records;
- Provide training on records management, records retention, and the appropriate storage of records;
- Maintain a record that includes a reasonably detailed description of what was done to search for responsive records (OIPC Investigation Report F15-03, Access Denied: Record Retention and Disposal Practices of the Government of British Columbia at p. 47, para. 7); and
- Be prepared to describe to the applicant and the OIPC the potential sources of records, sources searched, sources not searched (and reasons for not doing so), and how much time staff spent searching records (OIPC Order 00-32 at p. 5).

Of course, it is impossible to respond to an access request accurately and completely where someone refuses or fails to search or provide records on request, which is precisely why the best practices outlined above are key.

In the event that an incomplete response goes out to an applicant, they are entitled to request a review from the OIPC. As outlined above, the OIPC may open a file to investigate whether the public body complied with its duties under FOIPPA. If not, they will work with the FOI Head and local government to gain compliance, or they will formally order compliance.

If the local government and FOI Head have not provided adequate training, or maintained adequate record of what searches were made and requested, then they have failed to comply with section 6(1) of FOIPPA. But if these best practices are properly observed, accountability will rightly fall on the bad apples themselves.

C. What Can be Done?

In addition to the requirements and best practices outlined above, it is important for local governments to empower their FOI Heads to report any suspected or actual non-compliance with FOIPPA, whether to the CAO, Council or Board. Policies and procedures must guide the appropriate recourse for dealing with such internal conflicts, but FOI Heads should document any refusals or non-compliance. And where a bad apple refuses to comply with their FOIPPA obligations as part of their statutory and employment duties, and after internal avenues fail, FOI Heads should be empowered to report the matter to the OIPC.

V. CONCLUSION

All in all, compliance with FOIPPA – to an applicant’s satisfaction – requires teamwork from all players. While bad apples can create conflicts both internally and externally, there is recourse available through FOIPPA itself along with the local government’s established policies and procedures. Adherence to these, or clear documentation of non-compliance, can safeguard the organization or, ideally, avoid conflict in the first place.

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