

Submission to the Statutory Review of the *Access to Information and Protection of Privacy Act, 2015*

A record of the operation of the Act across access requests
to provincial departments, a municipality, and the Office of the
Information and Privacy Commissioner, April to September 2026

Submitted to Keri-Lynn Power, LLB (Hons), LLM
Committee appointed 20 May 2026 under section 117

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14 September 2026

This submission is made on the understanding that it will be published.

Summary

I am one applicant. Between April and September 2026 I made access requests to several provincial departments, to the Town of Gander, and to the Office of the Information and Privacy Commissioner itself. What follows is not an argument about what happened to me. It is a record of what the Act did when it was used, set out finding by finding, each one tied to a document and a page in the exhibits.

Nothing in this submission alleges that any public body or any person broke the law. Every finding below describes conduct that is either permitted by the Act as written, or that the Act provides no means of testing. That is the point of it.

The findings fall into four patterns.

TIME EXTENSIONS WITHOUT EFFECTIVE CONTROL. A public body may respond months late by way of extensions the applicant cannot see, cannot question, and cannot complain about. Section 42(8)(b) bars a complaint about an extension decision. The applications and approvals are held by the Commissioner, who refuses them under section 41(c). The Commissioner has stated in writing that it cannot review its own decision and that the practical alternative is the Supreme Court. On my own file the second and third extension notices were issued twenty-four and forty-three business days after the fifteen business day application period in section 23(1) had closed, and the final response came sixty-nine business days after receipt against a statutory twenty. Whether the applications behind them were made in time is something no applicant in this province can establish.

SEVERANCE WITHOUT STATED AUTHORITY. Most of the content of three released pages was blacked out and labelled only "Non-responsive", with no provision cited at the severance and no mention of it in the response letter. An exception applied on twelve pages of the same release appears nowhere in the letter's table of provisions and is discoverable only from annotations printed on the pages. A municipal response letter cites one section three different ways, the third as "and/or".

COMPLETENESS FAILURES. A release contradicts itself by \$618,600 on its own documents. Nineteen of 172 released pages reproduce a page already in the release. An item of a request was dropped from a public body's own statement of scope and the list renumbered so the omission is not visible. A delivery date was promised outside the statutory deadline with no extension sought. In a separate 454 page release, two pages were withheld in their entirety with no severance at all, and were released only two months later, after a complaint had been made and an oversight analyst had put questions to the department.

NO REMEDY WHERE THE COMMISSIONER IS ITSELF THE PUBLIC BODY. When the oversight body is the public body, the Act supplies no independent reviewer. The applicant is directed to litigate against the office that would otherwise review the matter.

The recommendations at the end of this submission attach to those findings one by one. They are drafted to be small and specific, because each one closes a gap this record demonstrates.

Method, and the limits I have put on myself

Every finding is cited to an exhibit, a page and a date. Where a page in a released records package is cited, the printed page number in the top right corner of that page is used, not its position in the PDF file, because the two diverge once pages are removed.

Where I could not prove something, I have not asserted it. Specifically:

- I prove the date each extension notice was issued. I do not assert the date any application reached the Commissioner, because that date appears on no notice and the Commissioner refused to disclose it.
- I use \$618,600 as the figure in Finding 7 and nothing larger, although the release suggests a further shortfall, because the larger figure rests on a description mismatch I have not put to the department.
- Four pairs of duplicate pages are excluded from the duplicate count in Finding 8, because slides reused between two presentations are two records, not padding.
- Where a business day count depends on a municipal closure calendar I have not obtained, I have written the finding so that it does not turn on a date.

Business days for provincial departments are counted on the Treasury Board Secretariat 2026 Paid Holidays schedule, which is the schedule those departments work to.

I have deliberately left out everything that is not about the operation of the Act. There is no allegation about any individual's conduct, and nothing here about any other matter I have on the record.

Pattern A. Time extensions without effective control

Finding 1. An applicant cannot test whether a time extension was lawfully applied for or granted.

WHAT HAPPENED. Three mechanisms close on each other. The Commissioner approves an extension on an application from the public body. The applicant is barred by statute from complaining about that decision. The application and the approval are held by the Commissioner, who refuses them as records connected to its investigatory function. The Commissioner states in writing that it could not review the matter without reviewing its own decision, and names the Supreme Court Trial Division as the practical alternative.

SECTIONS ENGAGED. 23(1), 23(2), 42(8)(b), 41(c), 52.

EXHIBITS. E04 page 4, where the public body itself reproduces section 42(8)(b) in its response letter. E22, the Commissioner's letter of 14 August 2026, page 2. E28, the Commissioner's own published guidance.

The Commissioner's guidance document states that the only extension available to a public body under the Act is through an application to the Commissioner under section 23, and that such an application may be made not later than fifteen business days after receiving the request.

THE OPERATIONAL FAILURE. There is no route by which an applicant in this province can establish whether a time extension complied with the Act. Not a complaint, not a review, not a disclosure. This is not a gap in administration. It is the combined effect of three provisions operating exactly as written.

Finding 2. Extension notices issued long after the application period had closed, each dated the expiry day of the last.

WHAT HAPPENED. A request was received by the department on 30 April 2026. The fifteen business day application period closed on 22 May 2026. The twenty business day response deadline was 29 May 2026.

Event	Date	Business days after receipt	Position against the section 23(1) cutoff of 22 May 2026
Request received	30 April 2026	0	—
Extension 1 notified	30 April 2026	0	Inside the period
Extension 2 notified	26 June 2026	39	24 business days after it closed
Extension 3 notified	27 July 2026	58	43 business days after it closed
Final response	11 August 2026	69	103 calendar days, against a statutory 20

Each notice is dated the exact expiry day of the extension before it. Holidays falling inside the window were 18 May, 22 June, 1 July and 13 July 2026.

SECTIONS ENGAGED. 16, 23(1), 23(2).

EXHIBITS. E01, E02, E03, E04.

THE OPERATIONAL FAILURE. What the record proves is the date each notice was issued. What it cannot prove is the date each application reached the Commissioner, because that date appears on no notice and the Commissioner refused to disclose it. The applicant is told a deadline has moved, is given no means of knowing whether the move was authorised in time, and is barred by section 42(8)(b) from complaining about it. The gap here is measured in weeks. No adjustment to the holiday list brings 26 June or 27 July inside a period that closed on 22 May.

Finding 3. A second extension notice dated after the deadline it extended had lapsed, and notices that state their length in the wrong unit.

WHAT HAPPENED. A second request, to a different department, was received on 5 May 2026. Twenty business days from that date is 3 June 2026. The first extension notice is dated 3 June 2026, the deadline day itself, and five business days after the section 23(1) application period had closed on 27 May 2026. It carried the deadline to 6 July 2026. The second extension notice is dated 7 July 2026, the day after the deadline it was extending had lapsed, and the coordinator's covering email concedes a delay in notification. It resets the deadline to 25 August 2026.

Both notices state their length as "an additional 22 days" and "an additional 35 days". Neither says business days. Both then quote section 23(2) in full, which speaks only of business days.

SECTIONS ENGAGED. 16, 23(1), 23(2).

EXHIBITS. E15, E16.

THE OPERATIONAL FAILURE. A statutory deadline was extended by a notice issued after it had expired, and the applicant learned of it only then. Separately, a notice that must be measured in business days states its length in days, leaving the applicant to work the unit out from the date. The arithmetic in both notices reconciles when business days are counted inclusive of the letter date. The defect is in what the notice tells the applicant, not in the calculation behind it.

Pattern B. Severance without stated authority

Finding 4. "Non-responsive" used to black out most of a released page, with no provision cited and no mention in the response letter.

WHAT HAPPENED. Three pages inside a released records package carry orange boxed labels reading "Non-responsive" over solid black blocks covering most of each page, while column headers and a single surviving row remain legible.

- Printed page 158 of 190, a stakeholder engagement spreadsheet. The full column header row survives. Two separate blocks are blacked, each with its own label. One row survives.
- Printed page 161 of 190, a grant application summary. Blocks above and below are blacked and labelled. One line survives.
- Printed page 162 of 190, a one time payments sheet. The full header row survives. The body is blacked and labelled. An operational grant block below survives.

No provision of the Act is cited on any of the three pages. The response letter accounts for non-responsiveness only as whole page removal, naming pages 163 to 169, 179 and 188. It says nothing about severance applied inside a page it released.

SECTIONS ENGAGED. 17, notice of refusal stating the provision relied on. 68, severance. Non-responsiveness is not an exception in the Act.

EXHIBITS. E05, E06, E07, the page images. E04 page 2, the letter's own accounting.

THE OPERATIONAL FAILURE. A public body can black out the majority of a page it has released, cite no authority at the severance, omit the fact from its response letter, and the applicant can discover it only by reading every page of the release. Nothing in the Act requires the letter and the pages to agree.

Finding 5. An exception applied on twelve pages, discoverable only from annotations printed on those pages.

WHAT HAPPENED. The response letter quotes section 40(1) in full in its list of exceptions applied. The letter's page table, which states which provision was applied to which pages, names only sections 29(1)(a), 35(1)(d) and 35(1)(g). Section 40(1) appears nowhere in that table.

It appears instead as an orange annotation printed at the top of individual pages, reading:

| *Redactions on this page are s.40(1) unless otherwise noted.*

Every one of the 172 released pages was examined for such an annotation. Twelve pages carry the section 40(1) annotation: printed pages 12, 15, 23, 59, 69, 123, 125, 135, 141, 142, 175 and 177. Two further pages carry the same form of annotation for section 29(1)(a), and one for sections 35(1)(d) and 35(1)(g).

SECTIONS ENGAGED. 17, 40(1).

EXHIBITS. E11, printed page 69. EO4, the response letter and its page table.

THE OPERATIONAL FAILURE. The document that exists to tell an applicant what was withheld and under what authority does not do so. The authority is recoverable only by reading the released pages themselves, one at a time. An applicant who relies on the response letter, which is the document the Act requires, will be wrong about which exception was applied to most of the severances in the release.

That this is the accepted position was confirmed to me in writing by an analyst at the Commissioner's Office on a separate file, in these terms:

| *The Department is not required to present you with a list or table stating where all redactions are applied. It is up to an applicant to review the records they receive.*

I do not say that statement is wrong on the law as it stands. I say it describes the gap this finding is about.

Finding 6. One response letter citing the same section three different ways, the third as "and/or".

WHAT HAPPENED. A municipal response letter lists its exceptions as "Section 35(1)(f) and (g)". The body of the same letter states that "section 35(1)(b) and (g)" were applied to banking information. Further down, the same letter states that material was redacted "under section 35 (d), (f) and/or (g)". The same letter lists section 30 in its bullets and applies "section 30(1)(a)" in its body.

SECTIONS ENGAGED. 17, 30, 35.

EXHIBIT. E21, Form 4B of 13 August 2026.

THE OPERATIONAL FAILURE. An applicant deciding whether to complain must know which exception was applied to what. Three combinations of one section appear in a single letter and the third is expressed as "and/or", so the applicant is not told which subsection was relied on. Nothing in the Act requires a public body to reconcile its own citation list against its own reasons.

Recorded in fairness: the same letter states that the public interest override in section 9 was considered against both section 30 and section 35 and decided against release in each case. That is more reasoning than most responses in this record contain.

Pattern C. Completeness failures

Finding 7. A release that contradicts itself by \$618,600, and no step at which it must be reconciled.

WHAT HAPPENED. The entire answer to two items of a request was a payments table, titled as covering 1 January 2003 to 10 June 2026. Its earliest row is 5 May 2017. For the years 2018-19, 2019-20 and 2020-21 it shows a \$120 event in 2018, a \$750 grant in 2019, and nothing in 2020.

At printed page 173 of the same release, a departmental briefing note states:

GovNL provides annual operational funding to CSCNL. CSCNL was included in the three-year, multi-year funding pilot and received \$266,200 annually from GNL beginning in 2018-19. This amount includes \$206,200 from CSSD and \$60,000 from IPGS.

Three years at \$206,200 is \$618,600 that does not appear in the table.

The obvious answer would be that the money came from a different department whose payments would not appear on this department's ledger. That answer fails on the release itself: printed pages 161 and 162 are that other department's own documents, held by the responding department and released in the same package, and both show it paying \$206,200.

SECTION ENGAGED. 13, the duty to assist and to respond openly, accurately and completely.

EXHIBITS. E08, the payments table at printed page 1. E10, the briefing note at printed page 173. E06 and E07, pages 161 and 162.

THE OPERATIONAL FAILURE. Either the release contradicts itself on its face, or the search that produced the table was incomplete. The applicant cannot tell which, and the record supports no third reading. There is no step in the Act at which a public body must certify that a compiled record offered as a complete answer is complete, state the source system searched, the period actually covered, or whether predecessor departments were included.

Limit held: \$618,600 is the only figure used. A further apparent shortfall of \$24,709 in 2021-22 is not used, because it rests on a line the table describes as operational funding while page 21 of the same release is a youth grant approval letter for \$19,656, two dollars from the table figure. That point belongs to the department to answer, not to this submission to assert.

Finding 8. A release padded with pages that reproduce pages already in it.

WHAT HAPPENED. Of 172 released pages, 19 are pixel identical to an earlier page in the same release once the printed page stamp is excluded. A thirteen page funding agreement appears in full twice, at printed pages 61 to 73 and again at 127 to 139, twelve of the thirteen pixel identical. Three further exact pairs appear at 32 and 76, 34 and 83, and 36 and 78. Unique responsive content is roughly 153 pages.

METHOD. Every page was rendered at 60 dpi and hashed, with the top six percent of each page clipped before hashing, because the printed page stamp otherwise makes every page unique. Four slide pairs are excluded from the count, because reuse of slides between two presentations makes them two records and not padding. The figure used is therefore at least sixteen of 172, measured rather than estimated.

SECTION ENGAGED. 13.

EXHIBITS. E12 and E23, printed pages 32 and 76. E24 and E25, printed pages 83 and 78, which repeat printed pages 34 and 36.

THE OPERATIONAL FAILURE. Page counts are what applicants are told a release contains and what public bodies report. Nothing in the Act requires that count to be of unique responsive pages, and nothing requires a public body to remove, or even identify, material it has already produced in the same release.

Finding 9. An item of a request dropped, and the list renumbered so the omission is not visible.

WHAT HAPPENED. A seven item request of 24 July 2026 was restated by the public body in its own Form 2 of 29 July 2026 and again in its Form 3 of 10 August 2026. In both, what is printed as item 4 is in fact the applicant's item 5. The applicant's item 4, internal deliberation records, appears in neither statement of scope. The list was renumbered, so nothing on the face of either form shows that an item is missing.

SECTION ENGAGED. 13.

EXHIBIT. E20.

THE OPERATIONAL FAILURE. There is no step in the Act at which the scope a public body is processing is confirmed back to the applicant item by item, and no requirement that every numbered item be answered or expressly declined with reasons. An applicant who does not compare the body's restatement against his own request word for word will not know an item was dropped.

Finding 10. Delivery promised outside the statutory deadline, with no extension sought.

WHAT HAPPENED. The public body's own Form 2 records receipt of the request on 24 July 2026. Its Form 3 promises delivery on 24 August 2026. That is outside twenty business days from receipt however the municipality counts its own closure days. No extension was applied for and none has been produced. Form 2, dated 29 July, was not sent until 10 August.

SECTIONS ENGAGED. 16, 23.

EXHIBIT. E20.

THE OPERATIONAL FAILURE. A response date outside the statutory period was set by the public body on its own form, without the extension mechanism in the Act being used at all. The applicant's only answer is a deemed refusal complaint, which requires him to start a process, while the public body incurs nothing by having set the date.

Limit held: the municipality sets its own closure days and I have not obtained that calendar. The 21 August date is stated as the latest possible expiry, not asserted to the day.

Finding 14. Two pages withheld in their entirety, with no severance attempted, in a 454 page release that severs line by line everywhere else.

WHAT HAPPENED. A second department released 454 pages on 9 July 2026. The printed page numbers run 1 to 129, jump to 132, then run unbroken to 454. There is one break in the whole set, and it is these two pages. Page 130 was withheld under sections 35(1)(d), 35(1)(g) and 40(1). Page 131 was withheld under sections 35(1)(d) and 35(1)(g). Neither page was severed. Both were removed in full.

The department has identified what they are. Its own annotation beside an email in the same release states:

This attachment can be found on pages 130-131; protected pursuant to s. 35(1)(d)(g) and 40(1).

The email it sits beside is at printed page 128, dated 4 May 2026, naming its own attachment as a programme budget proposal and asking when the agreement is coming for signature. Page 129 closes that chain. Page 132 begins a different one.

The same release handles comparable material differently. Printed page 53 is a programme budget released with nothing blacked out at all, showing salaries of \$98,300, participant wages and benefits of \$572,454, administration of \$15,732, and a total programme cost of \$791,100, with explanatory notes beneath the salary line. Printed page 132, the page immediately after the gap, carries three separate severances marked line by line against three separate lines.

So the department severs line by line, it did so on the page immediately after the gap, and it released a comparable budget in full elsewhere in the same package.

On 8 September 2026, two months after the response and after a complaint had been filed and an analyst at the Commissioner's Office had put written questions to the department, both pages were released in their entirety. They are reproduced at E35 and E36. Page 130 is a budget table setting one year's figures against the next. Its salary line is annotated in the department's own release as three positions, one full time and two prorated. Page 131 is a two line subtotal and total. Nothing on either page identifies any individual.

SECTIONS ENGAGED. 8(2), which entitles an applicant to the remainder of a record where severance is reasonable. 43(1), which places the burden on the public body. 35, 40(1).

EXHIBITS. E18, the response letter of 9 July 2026. E29, printed page 53. E30, printed page 128. E31, printed page 129. E32, printed page 132. E33, the Commissioner's Office correspondence on the two pages. E34, the notification of formal investigation, 10 September 2026. E35 and E36, printed pages 130 and 131 as released on 8 September 2026.

THE OPERATIONAL FAILURE. Two whole pages with not one severable line does not meet the burden in section 43(1) on the face of a release that severs line by line everywhere else. The pages were released, but only after an applicant complained, framed the point, and an oversight analyst pressed the department. Nothing in the Act required the department to explain, at the time of the

response, why severance was not reasonable on those two pages. An applicant who did not compare the printed page numbers across 454 pages would not have known the gap was there.

Recorded, and it cuts the other way: the analyst did not accept the department's position on those pages and said so in writing before any report was needed. That is the oversight function working. It required a complaint, a narrowing, and two months to produce a result the Act could have required at the outset.

Pattern D. No remedy where the Commissioner is itself the public body

Finding 11. The Commissioner refused its own records of extension approvals and named the court.

WHAT HAPPENED. I asked the Office of the Information and Privacy Commissioner for the extension applications made to it and the approvals it granted on my files, including the date each application was received. The Office refused items 1 to 6 on 14 August 2026. Its letter states at page 2 that records relating to applications for extending the deadline to respond to an access request are records connected to its investigatory function and are therefore required to be withheld. The same page states that any review by that Office would raise issues of conflict of interest because it would in effect be reviewing its own decision. The same page states that the most practical alternative would be an appeal to the Supreme Court Trial Division.

SECTIONS ENGAGED. 41(c), 42, 52.

EXHIBIT. E22.

THE OPERATIONAL FAILURE. The oversight body is also a public body under the Act, and when it is, the Act supplies no independent reviewer. The only route to test it is to litigate against it. The records refused are the records that would show whether the extension provisions were complied with in the first place, which is Finding 1 closing.

Finding 12. A statutory decision letter dated 2026 directing an applicant to pandemic era court operations.

WHAT HAPPENED. The same letter of 14 August 2026 tells the applicant at page 2 that he may wish to contact the Court directly regarding procedures for filing an appeal during the Court's restricted operations in light of the pandemic. The Court's published Practice Note on Virtual Appearances states that the Court expects increased use of virtual appearances to remain a permanent part of how it delivers its services.

SECTIONS ENGAGED. 17, 52.

EXHIBIT. E22 page 2.

THE OPERATIONAL FAILURE. The notice that carries an applicant's appeal rights described a state of affairs the Court itself had moved past, in what was the applicant's only formal notice of those rights. Template text in statutory decision letters is not reviewed against the conditions it describes.

Finding 13. A complaint closed "accordingly", with no stated basis, before any investigation existed.

WHAT HAPPENED. A complaint was closed by the Office on 22 July 2026 on the footing that the public body had received an extension on its final response deadline. The closing email conceded that the public body had not given the applicant proper notice of that approved extension, and stated that the Office was unable to proceed with an investigation at this time. A later email of 18 August 2026 confirmed the closure and stated that the file had been closed accordingly. On 14 August 2026, between those two dates, the same Office refused the extension records as connected to its investigatory function.

SECTIONS ENGAGED. 41(c), 44, 45.

EXHIBITS. E27, the closure of 22 July 2026. E26, the confirmation of 18 August 2026. E22, the refusal of 14 August 2026.

THE OPERATIONAL FAILURE. "Accordingly" means in accordance with something, and both answers are findings. If a written policy provides that a complaint is closed where an extension is in force, that policy is a record connected to no investigation, because none was opened, and this Committee should see it. If no written basis exists, a complaint was closed on unwritten practice in a matter where the Office had already accepted that the applicant received no proper notice. Separately, records were refused as investigatory in the same period in which a complaint was closed on the footing that there was nothing yet to investigate.

Recommendations

Each recommendation attaches to the findings named with it. They are drafted to be small and specific.

On time extensions

1. **Repeal or narrow section 42(8)(b)** so that an applicant may complain to the Commissioner about a decision respecting an extension of time, at least on the question of whether the application was made within the period allowed by section 23(1). *Findings 1, 2, 3.*
2. **Require the notice given under section 23 to state, on its face:** the date the application was made to the Commissioner, the date the Commissioner approved it, and the number of business days approved. The applicant currently receives none of these. *Findings 1, 2.*
3. **Provide expressly for what happens to an application made after the section 23(1) period has closed.** Either bar it, or create a written variation power exercised with reasons given to the applicant. At present the Act is silent and the practice is invisible. *Findings 2, 3.*
4. **Require that any period stated in a notice under section 23 be stated in business days,** in the same unit the section itself uses. *Finding 3.*
5. **Maintain a public register of extension applications and approvals,** recording the public body, the request file number, the dates of application and approval, and the number of business days granted. This is the least intrusive way to make compliance with section 23 verifiable without disclosing the substance of any request. *Findings 1, 2, 11.*

On severance and notice

6. **Require a provision of the Act to be cited at every severance on a released page,** printed at the severance itself. *Findings 4, 5.*
7. **Prohibit "non-responsive" as a severance within a page the public body has released as responsive,** or, if it is to be permitted, require the response letter to state that it has been used and identify the pages. *Finding 4.*
8. **Require the response letter to be a complete account of the exceptions applied,** so that every provision relied on anywhere in the release appears in the letter's own table against the pages it was applied to. *Finding 5.*
9. **Require a public body to state one combination of provisions for each severance,** and prohibit disjunctive citation such as "and/or" in a notice under section 17. *Finding 6.*

On completeness

10. **Require a certification with every response** that each numbered item of the request has been answered or expressly declined with reasons, and that the pages released are free of duplication. *Findings 8, 9.*
11. **Where a public body answers with a compiled or summary record**, require it to state the source system searched, the period actually covered, and whether predecessor public bodies were included. *Finding 7.*
12. **Require the public body's restatement of the scope of a request to reproduce the applicant's own numbering**, so that an item cannot be dropped without the omission being visible. *Finding 9.*
13. **Attach a consequence to a response date set outside the statutory period** that does not require the applicant to initiate a complaint. *Finding 10.*
14. **Require a public body that withholds a page in its entirety to state, in the response letter, why severance under section 8(2) was not reasonable on that page.** The burden is already on the public body under section 43(1). At present it is discharged only if an applicant complains. *Finding 14.*
15. **Require the response letter to identify every page number absent from a release and the provision relied on for each.** An applicant should not have to compare printed page numbers across hundreds of pages to discover that a page is missing. *Findings 4, 14.*

On the Commissioner as a public body

16. **Designate an independent reviewer in advance** for any access request where the Office of the Information and Privacy Commissioner is itself the public body, so that an applicant is not directed to the Supreme Court to test the oversight body. *Findings 11, 13.*
17. **Narrow section 41(c)** so that it does not reach records of an administrative approval made before any complaint or investigation exists. *Findings 11, 13.*
18. **Require that a decision to close a complaint without investigation be made under a published policy**, and that the closing notice state the basis relied on. *Finding 13.*
19. **Require template text in statutory decision letters to be reviewed annually** against the conditions it describes, at minimum where it states an applicant's appeal rights. *Finding 12.*

What I could not obtain, and what it would have shown

Two things are missing from this submission, and both are missing because they were refused or are not published.

The first is the date each extension application reached the Commissioner. That single date would resolve Findings 1, 2 and 3 in either direction. It was requested and refused under section 41(c).

The second is any written basis for closing a complaint where an extension is in force. If it exists it has not been published, and Finding 13 turns on whether it exists at all.

I make no assumption about either. I record that an applicant, having used every mechanism the Act provides, cannot obtain them.

Closing

I am not asking this Committee to find that anyone did anything wrong. I am asking it to notice that on this record, almost none of it could have been tested by the person it happened to. The Act gave me a right of access, a duty to assist, a complaint process and an oversight office, and at each point where I tried to establish whether those had operated correctly, the answer was that I could not.

That is a review of the operation of the Act, and it is why I have made this submission as well as filing an appeal in the Trial Division on the one refusal that leaves no other route.

Timothy Pratt Hill
14 September 2026

Exhibit list

No.	Document	Findings
E01	Departmental notice of first time extension, 30 April 2026	1, 2
E02	Departmental notice of second time extension, 26 June 2026	1, 2
E03	Departmental notice of third time extension, 27 July 2026	1, 2
E04	Departmental final response letter, 11 August 2026	1, 2, 4, 5
E05	Released records package, printed page 158 of 190	4
E06	Released records package, printed page 161 of 190	4, 7
E07	Released records package, printed page 162 of 190	4, 7
E08	Released records package, printed page 1 of 190, payments table	7
E09	Released records package, printed page 21 of 190, grant approval letter	7
E10	Released records package, printed page 173 of 190, briefing note	7
E11	Released records package, printed page 69 of 190, section 40(1) annotation	5
E12	Released records package, printed page 32 of 190	8
E15	Second department, notice of first time extension, 3 June 2026	3
E16	Second department, notice of second time extension, 7 July 2026	3
E17	Third department, notice of first time extension	3
E18	Third department, response letter, 9 July 2026	3
E19	Original access request as submitted	2, 9
E20	Municipal Form 2 of 29 July 2026 and Form 3 of 10 August 2026	9, 10
E21	Municipal Form 4B response letter, 13 August 2026	6
E22	Commissioner's refusal letter, 14 August 2026	1, 11, 12, 13
E23	Released records package, printed page 76 of 190, duplicate of page 32	8
E24	Released records package, printed page 83 of 190, duplicate of page 34	8
E25	Released records package, printed page 78 of 190, duplicate of page 36	8
E26	Commissioner's Office, confirmation of complaint closure, 18 August 2026	13
E27	Commissioner's Office, complaint closure, 22 July 2026	13
E28	Commissioner's published guidance, Requesting a Time Extension	1, 2, 3
E29	Second department's release, printed page 53 of 454, budget released in full	14
E30	Second department's release, printed page 128 of 454, email naming its attachment	14

E31	Second department's release, printed page 129 of 454, end of the chain	14
E32	Second department's release, printed page 132 of 454, line by line severance	14
E33	Commissioner's Office correspondence on the two withheld pages	14
E34	Notification of formal investigation, 10 September 2026	14
E35	Second department's release, printed page 130 of 454, released 8 September 2026	14
E36	Second department's release, printed page 131 of 454, released 8 September 2026	14

The exhibits follow this page in the order listed. Only the pages actually cited above are reproduced. Each exhibit page carries its exhibit number in the top left margin. The complete releases are held by the public bodies and by me, and can be produced on request.



April 30, 2026

Dear Applicant:

Re: Your request for access to information under Part II of the Access to Information and Protection of Privacy Act, 2015 [File #: SSWB-037-2026]

On April 30, 2026, the Department of Social Supports and Well-Being (SSWB) received your request for access to the following information:

Pursuant to the Access to Information and Protection of Privacy Act, 2015 (ATIPPA, 2015), I hereby request access to the following records held by or under the control of the Department of FAMA, or any other provincial department, agency, or crown corporation that may hold responsive records:
 Specific records requested:

1. All records showing grants, contributions, funding agreements, or transfer payments provided by the GNL to the Community Sector Council of Newfoundland and Labrador (CSCNL), for the period January 1, 2003 to the date of the request.
2. For each funding event identified: the dollar amount, the fiscal year, the approving department or minister, the program or budget line under which the funding was allocated, and the stated purpose of the funding.
3. All correspondence, memoranda, briefing notes, emails, or any other records between the GNL and CSCNL relating to the negotiation, approval, renewal, or review of any funding arrangement for the same period.
4. Any records documenting CSCNL participation in government working groups, advisory committees, joint steering committees, or policy consultations during the period January 1, 2015 to present, including the names of CSCNL representatives who participated and records or minutes of those proceedings.
5. Any records relating to the multi-year community sector funding program announced in 2-17 and The Way Forward with Community work plan released April 2019, specifically any records identifying CSCNL as a recipient, participant, or partner organization, and any records naming individual CSCNL staff members in connection with those programs.
6. All records showing payments made by the GNL to CSCNL under the AMPLIFY program or any other provincially funded program administered by CSCNL, for the period January 1, 2025 to October 14, 2025. This includes any records identifying CSCNL staff members responsible for administering those programs during that specific period.

Please be advised that with approval from the Information and Privacy Commissioner under section 23 of the **Access to Information and Protection of Privacy Act, 2015** (the Act), the 20 business day time limit for responding to your request has been extended for an additional 20 business days and we expect to respond to your request by June 26, 2026.

This extension of time is necessary due to the timeframe and the number of areas/records to be searched.

This extension is in accordance with subsection 23(2) of the Act, which states:

23(2) The commissioner may approve an application for an extension of time where the commissioner considers that it is necessary and reasonable to do so in the circumstances, for the number of business days the commissioner considers appropriate.

If you have any further questions, please feel free to contact me by email at ATIPP-SSWB@gov.nl.ca.

Sincerely,

Trista Camizzi
Senior Access to Information Coordinator



June 26, 2026

Dear Applicant:

Re: Your request for access to information under Part II of the Access to Information and Protection of Privacy Act, 2015 [File #: SSWB-037-2026]

On April 30, 2026, the Department of Social Supports and Well-Being (SSWB) received your request for access to the following information:

Pursuant to the Access to Information and Protection of Privacy Act, 2015 (ATIPPA, 2015), I hereby request access to the following records held by or under the control of the Department of Families and Affordability, or any other provincial department, agency, or crown corporation that may hold responsive records: Specific records requested:

1. All records showing grants, contributions, funding agreements, or transfer payments provided by the GNL to the Community Sector Council of Newfoundland and Labrador (CSCNL), for the period January 1, 2003 to the date of the request.
2. For each funding event identified: the dollar amount, the fiscal year, the approving department or minister, the program or budget line under which the funding was allocated, and the stated purpose of the funding.
3. All correspondence, memoranda, briefing notes, emails, or any other records between the GNL and CSCNL relating to the negotiation, approval, renewal, or review of any funding arrangement for the same period.
4. Any records documenting CSCNL participation in government working groups, advisory committees, joint steering committees, or policy consultations during the period January 1, 2015 to present, including the names of CSCNL representatives who participated and records or minutes of those proceedings.
5. Any records relating to the multi-year community sector funding program announced in 2017 and The Way Forward with Community work plan released April 2019, specifically any records identifying CSCNL as a recipient, participant, or partner organization, and any records naming individual CSCNL staff members in connection with those programs.
6. All records showing payments made by the GNL to CSCNL under the AMPLIFY program or any other provincially funded program administered by CSCNL, for the period January 1, 2025 to October 14, 2025. This includes any records identifying CSCNL staff members responsible for administering those programs during that specific period.

Please be advised that with approval from the Information and Privacy Commissioner under section 23 of the **Access to Information and Protection of Privacy Act, 2015** (the Act), the time limit for responding to your request has been extended for an additional 20 business days and we expect to respond to your request by July 27, 2026.

This extension of time is necessary as meeting deadline would unreasonably interfere with operations of the public body and there are consults required with another public body.

This extension is in accordance with subsection 23(2) of the Act, which states:

23(2) The commissioner may approve an application for an extension of time where the commissioner considers that it is necessary and reasonable to do so in the circumstances, for the number of business days the commissioner considers appropriate.

If you have any further questions, please feel free to contact me by email at ATIPP-SSWB@gov.nl.ca.

Sincerely,

Trista Camizzi

Senior Access to Information Coordinator



July 27, 2026

Dear Applicant:

Re: Your request for access to information under Part II of the Access to Information and Protection of Privacy Act, 2015 [File #: SSWB-037-2026]

On April 30, 2026, the Department of Social Supports and Well-Being (SSWB) received your request for access to the following information:

Pursuant to the Access to Information and Protection of Privacy Act, 2015 (ATIPPA, 2015), I hereby request access to the following records held by or under the control of the Department of Families and Affordability, or any other provincial department, agency, or crown corporation that may hold responsive records: Specific records requested:

1. All records showing grants, contributions, funding agreements, or transfer payments provided by the GNL to the Community Sector Council of Newfoundland and Labrador (CSCNL), for the period January 1, 2003 to the date of the request.
2. For each funding event identified: the dollar amount, the fiscal year, the approving department or minister, the program or budget line under which the funding was allocated, and the stated purpose of the funding.
3. All correspondence, memoranda, briefing notes, emails, or any other records between the GNL and CSCNL relating to the negotiation, approval, renewal, or review of any funding arrangement for the same period.
4. Any records documenting CSCNL participation in government working groups, advisory committees, joint steering committees, or policy consultations during the period January 1, 2015 to present, including the names of CSCNL representatives who participated and records or minutes of those proceedings.
5. Any records relating to the multi-year community sector funding program announced in 2017 and The Way Forward with Community work plan released April 2019, specifically any records identifying CSCNL as a recipient, participant, or partner organization, and any records naming individual CSCNL staff members in connection with those programs.
6. All records showing payments made by the GNL to CSCNL under the AMPLIFY program or any other provincially funded program administered by CSCNL, for the period January 1, 2025 to October 14, 2025. This includes any records identifying CSCNL staff members responsible for administering those programs during that specific period.

Please be advised that with approval from the Information and Privacy Commissioner under section 23 of the **Access to Information and Protection of Privacy Act, 2015** (the Act), the time limit for responding to your request has been extended for an additional 10 business days and we expect to respond to your request by August 11, 2026.

This extension of time is necessary as meeting deadline would unreasonably interfere with operations of the public body and there are consults required with another public body.

This extension is in accordance with subsection 23(2) of the Act, which states:

23(2) The commissioner may approve an application for an extension of time where the commissioner considers that it is necessary and reasonable to do so in the circumstances, for the number of business days the commissioner considers appropriate.

If you have any further questions, please feel free to contact me by email at ATIPP-SSWB@gov.nl.ca.

Sincerely,

Jennifer Pino Morales
Access to Information Coordinator



August 11, 2026

Dear Applicant:

Re: Your request for access to information under Part II of the **Access to Information and Protection of Privacy Act, 2015** [File #: SSWB-037-2026]

On April 30, 2026, the Department of Social Supports and Well-Being (SSWB) received your request for access to the following information:

Pursuant to the Access to Information and Protection of Privacy Act, 2015 (ATIPPA, 2015), I hereby request access to the following records held by or under the control of the Department of FAMA, or any other provincial department, agency, or crown corporation that may hold responsive records: Specific records requested: 1. All records showing grants, contributions, funding agreements, or transfer payments provided by the GNL to the Community Sector Council of Newfoundland and Labrador (CSCNL), for the period January 1, 2003 to the date of the request. 2. For each funding event identified: the dollar amount, the fiscal year, the approving department or minister, the program or budget line under which the funding was allocated, and the stated purpose of the funding. 3. All correspondence, memoranda, briefing notes, emails, or any other records between the GNL and CSCNL relating to the negotiation, approval, renewal, or review of any funding arrangement for the same period. 4. Any records documenting CSCNL participation in government working groups, advisory committees, joint steering committees, or policy consultations during the period January 1, 2015 to present, including the names of CSCNL representatives who participated and records or minutes of those proceedings. 5. Any records relating to the multi-year community sector funding program announced in 2017 and The Way Forward with Community work plan released April 2019, specifically any records identifying CSCNL as a recipient, participant, or partner organization, and any records naming individual CSCNL staff members in connection with those programs. 6. All records showing payments made by the GNL to CSCNL under the AMPLIFY program or any other provincially funded program administered by CSCNL, for the period January 1, 2025 to October 14, 2025. This includes any records identifying CSCNL staff members responsible for administering those programs during that specific period.

I am pleased to inform you that a decision has been made by the Deputy Minister for Social Supports and Well-Being to provide access to some of the requested information. Please see the attached records.

The following exceptions to disclosure, as specified in the **Access to Information and Protection of Privacy Act, 2015** (the "Act") are as follows:

Section 29 Policy advice or recommendations

29. (1)(a) The head of a public body may refuse to disclose to an applicant information that would reveal advice, proposals, recommendations, analyses or policy options developed by or for a public body or minister.

Section 35 Disclosure harmful to the financial or economic interests of a public body

35. (1)(d) The head of a public body may refuse to disclose to an applicant information which could reasonably be expected to disclose information, the disclosure of which could reasonably be expected to result in the premature disclosure of a proposal or project or in significant loss or gain to a third party.

35. (1)(g) The head of a public body may refuse to disclose to an applicant information which could reasonably be expected to disclose information, the disclosure of which could reasonably be expected to prejudice the financial or economic interest of the government of the province or a public body.

Section 40 Disclosure harmful to personal privacy

40. (1) The head of a public body shall refuse to disclose personal information to an applicant where the disclosure would be an unreasonable invasion of a third party's personal privacy.

Please note that page 159 has been removed pursuant to sections 29(1)(a) and 35(1)(d). Pages 178 and 180-186 have been removed pursuant to sections 35(1)(d) and 35(1)(g).

Please also note that pages 163-169, 179, and 188 have been removed as they are not responsive to the request.

Please be advised that you may ask the Information and Privacy Commissioner to review the processing of your access request, as set out in section 42 of the **Access to Information and Protection of Privacy Act, 2015** (the "Act"). A request to the Commissioner must be made in writing within 15 business days of the date of this letter or within a longer period that may be allowed by the Commissioner.

The address and contact information of the Information and Privacy Commissioner is as follows:

Office of the Information and Privacy Commissioner
20 Crosbie Place
P. O. Box 13004, Stn. A
St. John's, NL A1B 3V8

Telephone: (709) 729-6309
Toll-Free: 1-877-729-6309
Email: commissioner@oipc.nl.ca

You may also appeal directly to the Supreme Court Trial Division within 15 business days after you receive the decision of the public body, pursuant to section 52 of the Act.

Please be advised that this request may be published on the [Completed Access to Information Requests](#) website. Requests will be posted when possible, but no sooner than three business days after a response is sent electronically, or five business days where a response is sent by mail. Please note that requests for personal information will not be posted online. Additional details regarding the process for publishing requests online can be found [here](#).

If you have any further questions, please feel free to contact me by email at ATIPP-SSWB@gov.nl.ca.

Sincerely,

Jennifer Pino Morales
Access to Information Coordinator

Access to Information and Protection of Privacy Act, 2015

Access or Correction Complaint

42. (1) A person who makes a request under this Act for access to a record or for correction of personal information may file a complaint with the commissioner respecting a decision, act or failure to act of the head of the public body that relates to the request.

(2) A complaint under subsection (1) shall be filed in writing not later than 15 business days

(a) after the applicant is notified of the decision of the head of the public body, or the date of the act or failure to act; or

(b) after the date the head of the public body is considered to have refused the request under subsection 16 (2).

(3) A third party informed under section 19 of a decision of the head of a public body to grant access to a record or part of a record in response to a request may file a complaint with the commissioner respecting that decision.

(4) A complaint under subsection (3) shall be filed in writing not later than 15 business days after the third party is informed of the decision of the head of the public body.

(5) The commissioner may allow a longer time period for the filing of a complaint under this section.

(6) A person or third party who has appealed directly to the Trial Division under subsection 52 (1) or 53 (1) shall not file a complaint with the commissioner.

(7) The commissioner shall refuse to investigate a complaint where an appeal has been commenced in the Trial Division.

(8) A complaint shall not be filed under this section with respect to

(a) a request that is disregarded under section 21 ;

(b) a decision respecting an extension of time under section 23 ;

(c) a variation of a procedure under section 24 ; or

(d) an estimate of costs or a decision not to waive a cost under section 26 .

(9) The commissioner shall provide a copy of the complaint to the head of the public body concerned.

Direct Appeal to Trial Division by an Applicant

52. (1) Where an applicant has made a request to a public body for access to a record or correction of personal information and has not filed a complaint with the commissioner under section 42, the applicant may appeal the decision, act or failure to act of the head of the public body that relates to the request directly to the Trial Division.

(2) An appeal shall be commenced under subsection (1) not later than 15 business days

(a) after the applicant is notified of the decision of the head of the public body, or the date of the act or failure to act; or

(b) after the date the head of the public body is considered to have refused the request under subsection 16 (2).

(3) Where an applicant has filed a complaint with the commissioner under section 42 and the commissioner has refused to investigate the complaint, the applicant may commence an appeal in the Trial Division of the decision, act or failure to act of the head of the public body that relates to the request for access to a record or for correction of personal information.

(4) An appeal shall be commenced under subsection (3) not later than 15 business days after the applicant is notified of the commissioner's refusal under subsection 45 (2).

Department / Organization	Division	Category	Scope	Well-Being Framework	Contact Name	Email	Position	Engagement (1) Status
[Redacted Content]								

Community Sector Council No.	Community Agency	Provincial	Combination	Linkway Ingress	Yes	Multiple contact points
[Redacted Content]						

Department of Children, Seniors and Social 2025-2026 Grant Application Summary				
	Budgeted	Actual - YTD	Variance	Number of Applicants
Social Economic Well Being				Non-responsive
Community Sector Council of NL (Quarterly)	206,200.00	206,200.00	0.00	
				Non-responsive

Department of Children, Seniors and Social Development
2025-26 One Time Payments

QL
Coding: 01-5137-130-88F0-1062

Date Application Received	HPRM #	Applicant/Vendor Name	Date Funding Approved	Approved Amount	Applicant Signed Contribution Agreement Received Date	Minister Authority letter received	Purchase Order #	Invoice #	Supplier #	Payment Amount	Date sent to GNL invoices	Approved by Finance	Payment Date	Electoral District	Status Notes/Comments
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Non-responsive



Operational Grant:

Community Sector Council of NL	Operational Grant	206,000.00	29-May-25	225009244	CSCONL1stQJUN2025	31162928	51,550.00	13-Jun-25	24-Jun-25	26-Jun-25
Community Sector Council of NL	Operational Grant	206,000.00	29-May-25	225009244	CSCONL2ndQJUL2025	31162928	51,550.00	1-Jul-25	7-Jul-25	9-Jul-25
Community Sector Council of NL	Operational Grant	206,000.00	29-May-25	225009244	CSCONL3rdQOCT2025	31162928	51,550.00	1-Oct-25	6-Oct-25	10-Oct-25
Community Sector Council of NL	Operational Grant	206,000.00	29-May-25	225009244	CSCONL4thQJAN2025	31162928	51,550.00			

206,200.00

ATIPP Request SSWB-037-2026

SSWB Payments to Community Sector Council of Newfoundland and Labrador

January 1, 2003 - June 10, 2026

Payment Date	Supplier Name	Invoice Date	Description	Amount
5/5/2017	COMMUNITY SECTOR COUNCIL	4/27/2017	REGISTRATION FOR COLLECTIVE IMPACT CSC EVENT HELD ON APRIL 10, 2017	50.00
5/15/2017	COMMUNITY SECTOR COUNCIL	5/10/2017	ANNUAL VOLUNTEERISM LUNCHEON 2017 - FEBRUARY 21, 2017	30.00
5/24/2017	COMMUNITY SECTOR COUNCIL	4/4/2017	COLLECTIVE IMPACT LEARNING EVENT	50.00
2/14/2018	COMMUNITY SECTOR COUNCIL	2/7/2018	ANNUAL VOLUNTEERISM LUNCHEON 2018 - MARCH 14, 2018	120.00
10/23/2019	COMMUNITY SECTOR COUNCIL	10/22/2019	SMALL GRANT FOR COMMUNITY SECTOR SUMMIT	750.00
11/25/2021	COMMUNITY SECTOR COUNCIL	11/17/2021	OPERATIONAL FUNDING - FISCAL YEAR 2021-22	19,658.00
11/26/2021	COMMUNITY SECTOR COUNCIL	11/26/2021	OPERATIONAL FUNDING - FISCAL YEAR 2021-22	161,833.00
5/4/2022	COMMUNITY SECTOR COUNCIL	3/3/2022	Training Session - Virtual Preparation, Delivery and electronic handouts March 30, 2022	500.00
5/24/2022	COMMUNITY SECTOR COUNCIL	5/19/2022	OPERATIONAL FUNDING - FISCAL YEAR 2022-23	103,100.00
9/26/2022	COMMUNITY SECTOR COUNCIL	9/23/2022	OPERATIONAL FUNDING - FISCAL YEAR 2022-23	103,100.00
4/26/2023	COMMUNITY SECTOR COUNCIL	4/3/2023	TO ENCUMBER FUNDS FOR ESTIMATED COST OF QUARTERLY CORE FUNDING FISCAL YEAR 2023-24	51,500.00
10/17/2023	COMMUNITY SECTOR COUNCIL	10/16/2023	TO ENCUMBER FUNDS FOR ESTIMATED COST OF QUARTERLY CORE FUNDING FISCAL YEAR 2023-24	103,000.00
2/12/2024	COMMUNITY SECTOR COUNCIL	2/9/2024	TO ENCUMBER FUNDS FOR ESTIMATED COST OF QUARTERLY CORE FUNDING FISCAL YEAR 2023-24	51,500.00
8/16/2024	COMMUNITY SECTOR COUNCIL	8/12/2024	TO ENCUMBER FUNDS FOR ESTIMATED COST OF OPERATION FUNDING - QUARTERLY PAYMENTS FISCAL YEAR 2024-2025	103,100.00
11/12/2024	COMMUNITY SECTOR COUNCIL	11/7/2024	TO ENCUMBER FUNDS FOR ESTIMATED COST OF OPERATION FUNDING - QUARTERLY PAYMENTS FISCAL YEAR 2024-2025	51,550.00
1/9/2025	COMMUNITY SECTOR COUNCIL	1/7/2025	TO ENCUMBER FUNDS FOR ESTIMATED COST OF OPERATION FUNDING - QUARTERLY PAYMENTS FISCAL YEAR 2024-2025	51,550.00
6/19/2025	COMMUNITY SECTOR COUNCIL	6/13/2025	TO ENCUMBER FUNDS FOR ESTIMATED COST OF QUARTERLY OPERATIONAL FUNDING - FISCAL YEAR 2025-26	51,550.00
7/3/2025	COMMUNITY SECTOR COUNCIL	7/1/2025	TO ENCUMBER FUNDS FOR ESTIMATED COST OF QUARTERLY OPERATIONAL FUNDING - FISCAL YEAR 2025-26	51,550.00
10/2/2025	COMMUNITY SECTOR COUNCIL	10/1/2025	TO ENCUMBER FUNDS FOR ESTIMATED COST OF QUARTERLY OPERATIONAL FUNDING - FISCAL YEAR 2025-26	51,550.00
1/5/2026	COMMUNITY SECTOR COUNCIL	1/1/2026	TO ENCUMBER FUNDS FOR ESTIMATED COST OF QUARTERLY OPERATIONAL FUNDING - FISCAL YEAR 2025-26	51,550.00



Government of Newfoundland and Labrador
Department of Children, Seniors and Social Development
Office of the Minister

NOV 10 2021

COR-2021-01059

Penelope Rowe
Community Sector Council NL (TechKnowTutors)
25 Anderson Avenue
St. John's, NL A1B 3E4

Dear Penelope Rowe:

I am pleased to inform you that your organization's application to the Grants to Youth Organizations (GTYO) has been approved for **\$19,656** for 2021-22.

As Minister, I am grateful for the work of your organization, as well as others supporting youth throughout the province. Your dedication and expertise play a significant role in empowering young Newfoundlanders and Labradorians to become the leaders of tomorrow.

You will find enclosed for your review and signature a contract between your organization and the Department of Children, Seniors and Social Development. Please have the contract signed by the appropriate authority within your organization and email to nlyouth@gov.nl.ca.

If you have any questions, please contact Emily Timmins, Supervisor of Youth Programs (A), at (709) 729-4349, or nlyouth@gov.nl.ca.

I wish you and the members of your organization continued success with your initiatives. Thank you for the work you do.

Sincerely,

A handwritten signature in black ink, appearing to read "John G. Abbott".

HON. JOHN G. ABBOTT, MHA
District of St. John's East – Quidi Vidi
Minister

Attach.

**Community Sector Council NL (CSC NL)
Meeting – February 27, 2025**

- GovNL provides annual operational funding to CSCNL. CSCNL was included in the three-year, multi-year funding pilot and received \$266,200 annually from GNL beginning in 2018-19. This amount includes \$206,200 from CSSD and \$60,000 from IPGS. The multi-year agreement was extended to March 31, 2025. CSCNL received \$251,200 to date this fiscal, with \$15,000 outstanding (to be paid by IPGS).
- CSSD is working to establish a renewed annual contribution agreement with CSCNL for 2025-2026 that better reflects its current work and government priorities.

Agenda items and analysis

CSC provided five agenda items for today's meeting

1. State of the sector and priority areas:

- The Community Sector continues to advocate for multi-year funding. Group benefits and retirement plans are also a priority for the sector.

2. Snapshots - CSCNL activities:

- Core lines of business are capacity building, well-being, research and policy, volunteerism, and social innovation. The CSCNL's major initiatives include:
 - AMPLIFY (Assisting My Potential – Labour Initiative for Youth) – a program that provides employment for targeted youth who may have little work experience or who may face challenges in locating employment.
 - techKNOWtutor – a free digital literacy teaching program to help individuals learn to use technology in their daily lives, regardless of age or background.
 - Vibrant Communities – through various initiatives, this program strives to better the well-being of those living with low income and poverty.
 - Sector Snapshots – a service that produces an array of research reports and sector snapshots to help guide community sector organizations and support government in making informed policy and program decisions.
 - Social Innovation and Incubation – through its recently launched Social Innovation Lab (May 2024) and in collaboration with Thriving Non-Profits, a BC organization, CSCNL launched a social accelerator and incubator program centered on revenue diversification.
 - Social Enterprise Through Acquisition (SETA) program – an initiative aimed at preserving small businesses by transforming them into sustainable social

Redactions on this page are s.40(1) unless otherwise noted.

8

IN WITNESS WHEREOF the Parties have caused this Agreement to be signed by their respective duly authorized representatives.

April 17, 2025
Date



Minister
Department of
Children, Seniors and Social
Development

April 17, 2025
Date


Witness

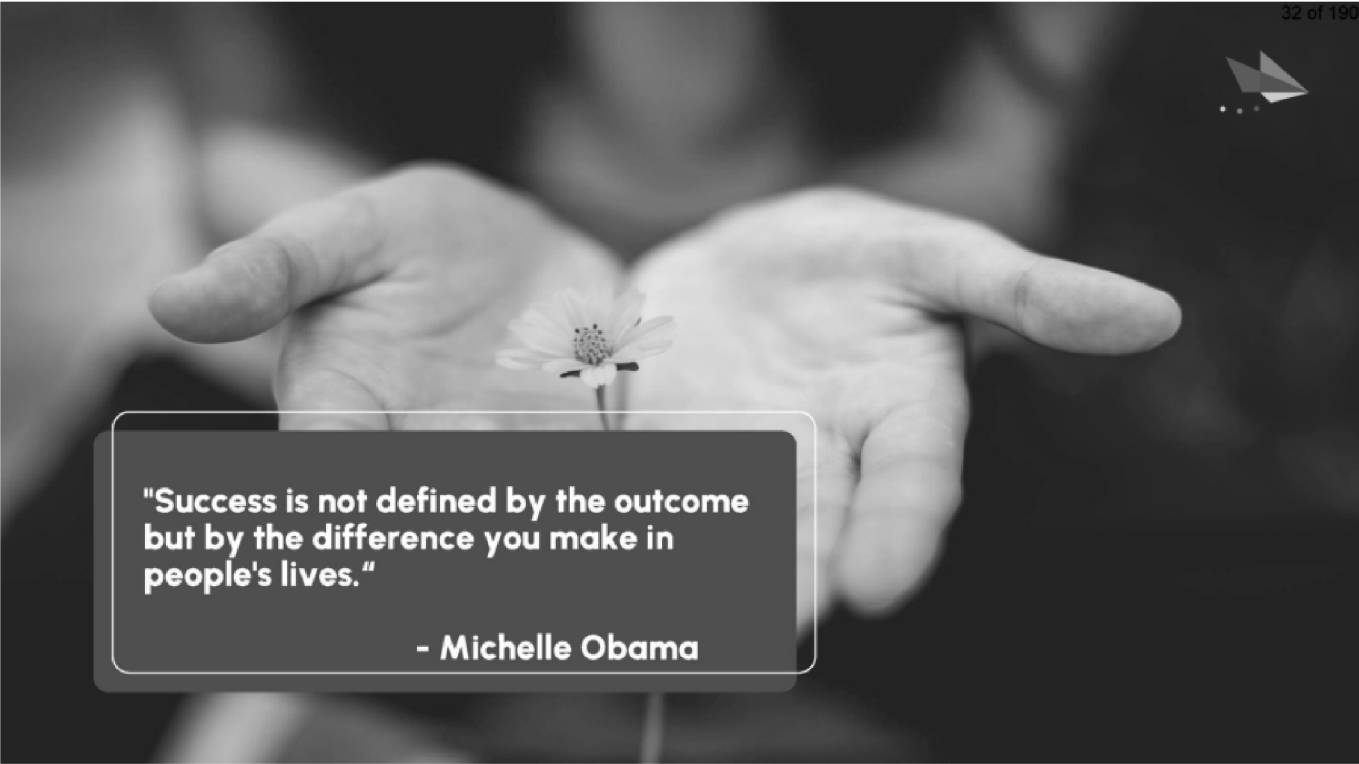
For the Recipient:

June 02/2025.
Date


Natasha Hudson, Chair
Board of Directors
Community Sector Council of
Newfoundland and Labrador Inc.

May 29, 2025
Date


Colin Corcoran, CEO
Community Sector Council of
Newfoundland and Labrador Inc.



**"Success is not defined by the outcome
but by the difference you make in
people's lives."**

- Michelle Obama



Government of Newfoundland and Labrador
 Department of Health and Community Services
 Access & Open Information Division, ATIPP Office

June 3, 2026

Dear Applicant:

Re: Your request for access to information under Part II of the Access to Information and Protection of Privacy Act, 2015 [Our File #: HCS/124/2026]

On **May 5, 2026**, the Department of Health and Community Services (HCS) received your access to information (ATI) request for the following records:

Pursuant to the Access to Information and Protection of Privacy Act, 2015 (ATIPPA, 2015), I hereby request access to the following records held by or under the control of the Department of FAMA, or any other provincial department, agency, or crown corporation that may hold responsive records:

Specific records requested:

- 1. All records showing grants, contributions, funding agreements, or transfer payments provided by the GNL to the Community Sector Council of Newfoundland and Labrador (CSCNL), for the period January 1, 2003 to the date of the request.**
- 2. For each funding event identified: the dollar amount, the fiscal year, the approving department or minister, the program or budget line under which the funding was allocated, and the stated purpose of the funding.**
- 3. All correspondence, memoranda, briefing notes, emails, or any other records between the GNL and CSCNL relating to the negotiation, approval, renewal, or review of any funding arrangement for the same period.**
- 4. Any records documenting CSCNL participation in government working groups, advisory committees, joint steering committees, or policy consultations during the period January 1, 2015 to present, including the names of CSCNL representatives who participated and records or minutes of those proceedings.**
- 5. Any records relating to the multi-year community sector funding program announced in 2-17 and The Way Forward with Community work plan released**



Government of Newfoundland and Labrador
Department of Health and Community Services

April 2019, specifically any records identifying CSCNL as a recipient, participant, or partner organization, and any records naming individual CSCNL staff members in connection with those programs.

6. All records showing payments made by the GNL to CSCNL under the AMPLIFY program or any other provincially funded program administered by CSCNL, for the period January 1, 2025 to October 14, 2025. This includes any records identifying CSCNL staff members responsible for administering those programs during that specific period.

Please be advised, with approval from the Information and Privacy Commissioner under section 23 of the **Access to Information and Protection of Privacy Act, 2015** (the Act), the time limit for responding to your request has been extended for an additional **22 days** and HCS expects a response to your request by **July 6, 2026**.

This extension is based on the fact that the department needs more time to process the records. As such, the request could not reasonably be completed in the time remaining. This extension is in accordance with subsection 23(2) of the Act, which states:

23(2) The commissioner may approve an application for an extension of time where the commissioner considers that it is necessary and reasonable to do so in the circumstances, for the number of business days the commissioner considers appropriate.

Should you have questions, please contact me by email at ATIPP-Health@gov.nl.ca.

Sincerely,

A handwritten signature in cursive script that reads "A. George".

Andie George
ATI Coordinator



**Government of Newfoundland and Labrador
Department of Health and Community Services
Access & Open Information Division, ATIPP Office**

July 7, 2026

Dear Applicant:

Re: Your request for access to information under Part II of the Access to Information and Protection of Privacy Act, 2015 [Our File #: HCS/124/2026]

On **May 5, 2026**, the Department of Health and Community Services (HCS) received your access to information (ATI) request for the following records:

Pursuant to the Access to Information and Protection of Privacy Act, 2015 (ATIPPA, 2015), I hereby request access to the following records held by or under the control of the Department of FAMA, or any other provincial department, agency, or crown corporation that may hold responsive records:

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- 5. Any records relating to the multi-year community sector funding program announced in 2-17 and The Way Forward with Community work plan released**



Government of Newfoundland and Labrador
Department of Health and Community Services

April 2019, specifically any records identifying CSCNL as a recipient, participant, or partner organization, and any records naming individual CSCNL staff members in connection with those programs.

6. All records showing payments made by the GNL to CSCNL under the AMPLIFY program or any other provincially funded program administered by CSCNL, for the period January 1, 2025 to October 14, 2025. This includes any records identifying CSCNL staff members responsible for administering those programs during that specific period.

Please be advised, with approval from the Information and Privacy Commissioner under section 23 of the **Access to Information and Protection of Privacy Act, 2015** (the Act), the time limit for responding to your request has been extended for an additional **35 days** and HCS expects a response to your request by **August 25, 2026**.

This extension is based on the fact that the department needs more time to process the records. As such, the request could not reasonably be completed in the time remaining. This extension is in accordance with subsection 23(2) of the Act, which states:

23(2) The commissioner may approve an application for an extension of time where the commissioner considers that it is necessary and reasonable to do so in the circumstances, for the number of business days the commissioner considers appropriate.

Should you have questions, please contact me by email at ATIPP-Health@gov.nl.ca.

Sincerely,

A handwritten signature in cursive script that reads "A. George".

Andie George
ATI Coordinator



Notice of First OIPC Approved Time Extension

May 29, 2026

Dear Applicant,

Re: Your request for access to information under Part II of the **Access to Information and Protection of Privacy Act, 2015** (JGRD/029/2026)

On May 5, 2026, the Department of Jobs, Growth & Rural Development received your request for access to the following records:

Pursuant to the Access to Information and Protection of Privacy Act, 2015 (ATIPPA, 2015), I hereby request access to the following records held by or under the control of the Department of FAMA, or any other provincial department, agency, or crown corporation that may hold responsive records:

Specific records requested:

- 1. All records showing grants, contributions, funding agreements, or transfer payments provided by the GNL to the Community Sector Council of Newfoundland and Labrador (CSCNL), for the period January 1, 2003 to the date of the request.**
- 2. For each funding event identified: the dollar amount, the fiscal year, the approving department or minister, the program or budget line under which the funding was allocated, and the stated purpose of the funding.**
- 3. All correspondence, memoranda, briefing notes, emails, or any other records between the GNL and CSCNL relating to the negotiation, approval, renewal, or review of any funding arrangement for the same period.**
- 4. Any records documenting CSCNL participation in government working groups, advisory committees, joint steering committees, or policy consultations during the period January 1, 2015 to present, including the names of CSCNL representatives who participated and records or minutes of those proceedings.**
- 5. Any records relating to the multi-year community sector funding program announced in 2-17 and The Way Forward with Community work plan released April 2019, specifically any records identifying CSCNL as a recipient, participant, or partner organization, and any records naming individual CSCNL staff members in connection with those programs.**
- 6. All records showing payments made by the GNL to CSCNL under the AMPLIFY program or any other provincially funded program administered by CSCNL, for the period January 1, 2025 to October 14, 2025. This includes any records identifying CSCNL staff members responsible for administering those programs**



Government of Newfoundland and Labrador
Department of Jobs, Growth & Rural Development

during that specific period.

Please be advised with approval from the Information and Privacy Commissioner under section 23 of the **Access to Information and Protection of Privacy Act, 2015** (the Act), the 20 business day time limit for responding to your request has been extended for an additional **25** days. We expect a final response to your request by **June 9, 2026**, unless you are otherwise notified.

This extension is in accordance with subsection 23(2) of the Act, which states:

23(2) The commissioner may approve an application for an extension of time where the commissioner considers that it is necessary and reasonable to do so in the circumstances, for the number of business days the commissioner considers appropriate.

If you have any further questions, please contact me by telephone at (709)729-7992 or by email at ATIPP-JGRD@gov.nl.ca.

Sincerely,

A handwritten signature in cursive script that reads "Asia Bazzocchi".

Asia Bazzocchi
JGRD ATIPP Coordinator



Response to Applicant - Partial Disclosure

July 9, 2026

Dear Applicant:

Re: Your request for access to information under Part II of the **Access to Information and Protection of Privacy Act, 2015** [Our File #: JGRD/029/2026]

On May 5, 2026, the Department of Jobs, Growth & Rural Development (JGRD), received your request for access to the following records:

Pursuant to the Access to Information and Protection of Privacy Act, 2015 (ATIPPA, 2015), I hereby request access to the following records held by or under the control of the Department of FAMA, or any other provincial department, agency, or crown corporation that may hold responsive records:

Specific records requested:

- 1. All records showing grants, contributions, funding agreements, or transfer payments provided by the GNL to the Community Sector Council of Newfoundland and Labrador (CSCNL), for the period January 1, 2003 to the date of the request.**
- 2. For each funding event identified: the dollar amount, the fiscal year, the approving department or minister, the program or budget line under which the funding was allocated, and the stated purpose of the funding.**
- 3. All correspondence, memoranda, briefing notes, emails, or any other records between the GNL and CSCNL relating to the negotiation, approval, renewal, or review of any funding arrangement for the same period.**
- 4. Any records documenting CSCNL participation in government working groups, advisory committees, joint steering committees, or policy consultations during the period January 1, 2015 to present, including the names of CSCNL representatives who participated and records or minutes of those proceedings.**
- 5. Any records relating to the multi-year community sector funding program announced in 2-17 and The Way Forward with Community work plan released April 2019, specifically any records identifying CSCNL as a recipient, participant, or partner organization, and any records naming individual CSCNL staff members in connection with those programs.**
- 6. All records showing payments made by the GNL to CSCNL under the AMPLIFY program or any other provincially funded program administered by CSCNL, for the period January 1, 2025 to October 14, 2025. This includes any records identifying CSCNL staff members responsible for administering those programs during that specific period..**

I am pleased to inform you that a decision has been made by the Deputy Minister for the Department of Jobs, Growth & Rural Development (JGRD), to provide access to some of the requested information within JGRD's custody and control. The responsive records are enclosed.

The remaining information has been exempted from disclosure pursuant to the **Access to Information and Protection of Privacy Act, 2015** (the Act) to include:

Policy advice or recommendations;

Section 29(1) The head of a public body may refuse to disclose to an applicant information that would reveal **(a)** advice, proposals, recommendations, analyses or policy options developed by or for a public body or minister;

Disclosure harmful to the financial or economic interests of a public body;

Section 35(1) The head of a public body may refuse to disclose to an applicant information which could reasonably be expected to disclose **(d)** information, the disclosure of which could reasonably be expected to result in the premature disclosure of a proposal or project or in significant loss or gain to a third party **(g)** information, the disclosure of which could reasonably be expected to prejudice the financial or economic interest of the government of the province or a public body;

Disclosure harmful to personal privacy;

Section 40(1): The head of a public body shall refuse to disclose personal information to an applicant where the disclosure would be an unreasonable invasion of a third party's personal privacy.

Please be advised the below pages have been redacted in their entirety, pursuant to the noted sections of **ATIPPA, 2015**.

Pages	ATIPPA, 2015
130	35(1)(d)(g), 40(1)
131	35(1)(d)(g)

Please be advised that you may ask the Information and Privacy Commissioner to review the processing of your access request, as set out in section 42 of the Act (a copy of this section has been enclosed for your reference). A request to the Commissioner must be made in writing within 15 business days of the date of this letter or within a longer period that may be allowed by the Commissioner.

The address and contact information of the Information and Privacy Commissioner is as follows:

Office of the Information and Privacy Commissioner
5th Floor, Beothuck Building
20 Crosbie Place
P. O. Box 13004, Stn. A
St. John's, NL. A1B 3V8

Telephone: (709) 729-6309
Toll-Free: 1-877-729-6309
Email: commissioner@oipc.nl.ca

You may also appeal directly to the Supreme Court within 15 business days after you receive the

Tim Hill



April 21, 2026

ATIPP Coordinator
Department of Families and Affordability
Government of Newfoundland and Labrador
81 Kenmount Road
St. John's, NL A1B 4J6

RE: Formal Access to Information Request — ATIPP-CSCNL-FUNDING-2026-001

Dear ATIPP Coordinator,

Please find enclosed my formal Access to Information and Protection of Privacy request, filed pursuant to the Access to Information and Protection of Privacy Act, 2015 (ATIPPA, 2015).

This request concerns all provincial government funding provided to the Community Sector Council of Newfoundland and Labrador (CSCNL) from 2003 to present, as well as any government correspondence, meeting records, or program payments involving CSCNL during that period — including during the 2025 provincial election campaign.

This is a matter of legitimate public interest. Bettina Ford, a long-term paid employee of CSCNL, was elected as the Liberal MHA for Gander in October 2025 — representing the same political party that significantly expanded government funding to and partnership with CSCNL during the 10 years it governed the province. The public has a right to the full financial record of that relationship.

Please respond in writing to the address or email above within 20 business days as required under ATIPPA, 2015.

Sincerely,

Tim Hill



10 AUGUST 2026: TOWN OF GANDER RESPONDS ON THE MIRROR REQUEST. FILE PB/980/2026. TWO DEFECTS ON THE FACE OF IT.

SOURCE FILE: RE__ATIPP_request__Town_records_concerning_time_extensions_on_PB_526_2026.eml

THE EMAIL

- FROM: Alexa Oldford <aoldford@gandercanada.com>, Town Clerk, 709-651-5922.
- TO: Tim Hill [REDACTED] CC: ATIPP <atipp@gandercanada.com>.
- SENT: Monday 10 August 2026, 12:36:20 UTC, which is 10:06 AM NDT.
- BODY IN FULL: "Good morning, Apologies for the delay in response. I'm just getting back in the office this morning since July 23. Please see Form 2 and Form 3 attached."
- ATTACHMENTS: PB-980-2026 - Form 2.pdf and PB-980-2026 - Form 3.pdf. Both extracted to W:\Base_Camp\Correspondence\ATIPP\Gander_PB-980-2026\.

THE FILE NUMBER

The mirror request now has a number. **PB/980/2026.** It is separate from PB/526/2026, which is the original Housing Accelerator Fund request and which carries its own OIPC approved deadline of 19 August 2026 and OIPC complaint file 0025-154-26-021. Do not merge the two.

FORM 2, ACKNOWLEDGEMENT

- Dated 29 JULY 2026. Signed BRAD HEFFORD, Chief Administrative Officer, not Oldford.
- Confirms receipt of the request on 24 JULY 2026, which is the date Tim asserted in his 28 July follow up.
- Recites the standard 20 business day rule and the only two clock movers, a s.23 extension approved by the OIPC and a s.26 suspension pending a cost estimate.
- IT WAS DATED 29 JULY AND NOT SENT UNTIL 10 AUGUST. Twelve days sitting. Oldford states she was out of office from 23 July.

FORM 3, SECTION 15 ADVISORY RESPONSE

- Dated 10 AUGUST 2026. Signed ALEXA OLDFORD, ATIPP Coordinator.
- States the records requested are available, the Town is processing the request, and "These records will be provided to you by August 24, 2026."

DEFECT ONE: THE PROMISED DELIVERY DATE FALLS OUTSIDE THE STATUTORY DEADLINE

Receipt is 24 July 2026 on the Town's own Form 2. Twenty business days from the first business day after receipt, 27 July, lands FRIDAY 21 AUGUST 2026. Counting the day of receipt itself would make it 20 August. Either count puts the deadline no later than 21 August.

Form 3 promises the records by MONDAY 24 AUGUST 2026. That is past the deadline.

The Town has not applied for an extension on PB/980/2026 and none has been produced. A municipality cannot extend its own time. Section 23(2) requires the approval of the Information and Privacy Commissioner, and a Form 5 extension notice must come to Tim in writing. Absent that, the 24 August date is a self declared extension with no authority behind it, and 22 August begins deemed refusal.

DEFECT TWO: AN ITEM OF THE REQUEST HAS BEEN DROPPED

Tim's request of 24 July 2026 contains FIVE numbered items. Form 2 and Form 3 both reproduce only FOUR. The item that is missing from both is:

"All internal Town records, including emails and notes, discussing the need for, preparation of, or authorization to submit either extension application."

What both Forms print as item 4 is in fact Tim's item 5, the notification records. The internal deliberation item has been silently dropped from the Town's own statement of scope, in the acknowledgement of 29 July and again in the advisory response of 10 August.

That is the single most substantive item in the request. It is what would show who inside the Town decided to seek two extensions and why. Its absence from both Forms means the Town is currently processing a narrower request than the one Tim made, and if nothing is said, the response on 24 August will be complete on its face against a scope that was quietly reduced.

DEFECT THREE, MINOR AND WORTH NOTING ONLY

The section 15 advisory response is due no later than 10 business days after receipt. Ten business days from 27 July lands 7 August 2026. Form 3 is dated 10 August. It is one to two business days late depending on the counting convention. Note it, do not build on it.

THE MOVE

One short letter to atipp@gandercanada.com, copy aoldford@gandercanada.com, doing three things and nothing else.

1. Acknowledge receipt of Form 2 and Form 3 and the file number PB/980/2026.
2. State that item 4 of the 24 July request, the internal Town records, is absent from both Forms, quote it back in full, and ask the Town to confirm in writing that it is within the scope being processed.
3. State that the Town's own Form 2 records receipt on 24 July, that the 20 business day period therefore expires no later than 21 August 2026, and that the 24 August date in Form 3 falls outside it. Ask whether the Town has applied to the Commissioner under s.23 and, if so, for a copy of the application and the Commissioner's approval. If it has not, ask for the response on or before 21 August.

Tone stays flat and procedural. No accusation, no reference to PB/526/2026 grievances, no mention of the OIPC complaint already running on the other file. This letter is about PB/980/2026 only.

DEADLINES NOW LIVE ON THIS TRACK

- 19 AUGUST 2026, PB/526/2026 response, OIPC approved second extension, OIPC complaint 0025-154-26-021 already standing.
- 21 AUGUST 2026, PB/980/2026 statutory response deadline on the Town's own stated receipt date.
- 24 AUGUST 2026, the date the Town has promised delivery, which is three calendar days past its own deadline.



Town of Gander
100 Elizabeth Drive
Gander, NL A1V 1G7
Ph: (709) 651-2930

Response to Applicant - Partial Access Granted Form 4B

August 13, 2026

Dear Applicant:

Re: **Your request for access to information under Part II of the Access to Information and Protection of Privacy Act, 2015 [Our File #PB/526/2026:]**

On April 24, 2026, The Town of Gander (the "Town") received your request for access to the following records:

Formal Request

Pursuant to the Access to Information and Protection of Privacy Act, 2015 (ATIPPA 2015) and the Municipalities Act, 1999, I hereby request access to the following records held by or under the control of the Town of Gander, for the full period which Bettina Ford served as Town Councillor and Deputy Mayor:

Specific Records Requested:

- 1. All travel expense claims submitted by or reimbursed to Bettina Ford in her capacity as Town Councillor or Deputy Mayor, including destination, stated purpose, dates, and dollar amounts, for the full duration of her service on Council.**
- 2. All contracts, agreements, purchase orders, or service agreements approved by Gander Town Council during Ford's tenure. For each: the vendor name, contract value, nature of work or services, date of approval, and the recorded council vote including how each councillor voted.**
- 3. All contracts, invoices, or payments made by the Town of Gander to any of the following companies during Ford's tenure on Council: Riverstone Construction Inc., Landmark Surveys and Engineering Limited, Canadian Courier Ltd., McCurdy Enterprises Limited, New Fun Land Limited, and Central Office Equipment Limited.**
- 4. All Town of Gander Council meeting minutes in which Bettina Ford participated in debate or a vote on any matter involving contracts, procurement, land use, zoning, development permits, grants, or any financial commitment by the municipality, for the full duration of her service.**
- 5. All declarations of conflict of interest or pecuniary interest filed by Bettina Ford during her service on Gander Town Council, as required under the Municipalities Act, 1999, including the matter declared, the date, and any recorded recusal from voting.**



Town of Gander
100 Elizabeth Drive
Gander, NL A1V 1G7
Ph: (709) 651-2930

6. All grants, contributions, funding agreements, service contracts, or payments made by the Town of Gander to the Community Sector Council of Newfoundland and Labrador (CSCNL) during Ford's tenure on Council, including amounts, dates, stated purposes, and the council vote approving each.

7. Any communications between Bettina Ford and CSCNL conducted through Town of Gander email systems, letterhead, or in her official capacity as a municipal official.

With respect to records requested under items 2, 4, 5, and 6, these documents are considered public records within the meaning of section 50 of the *Towns and Local Service Districts Act*, SNL 2023, c T-6.2, and are available for public inspection during the Town's regular business hours. Kindly contact the undersigned to arrange a time for you to attend to the Town offices to view the public records. Additionally, Town Council meeting minutes are available online at <https://www.gandercanada.com/municipal-government/council-meetings/>.

With respect to records requested under items 1, 3, and 7, we are pleased to enclose electronic copies of the responsive records, subject to certain limited information that has been refused in accordance with the following exception(s) to disclosure, as specified in the **Access to Information and Protection of Privacy Act, 2015 (the Act)**:

- Section 30 – Legal advice;
- Section 31(1)(l) – Information about the security of computer or system;
- Section 35(1)(f) and (g) – Harm to the financial or economic interest of the public body;
- Section 39(1) and (2) – Third party business information; and,
- Section 40 – Third party personal information

The Town has applied section 30(1)(a) to information that is solicitor-client privileged within the records. That exception to information under the Act is also discretionary. As such, we contemplated whether to release the information under the public interest override provision which is located in section 9 of the Act. In determining not to release the information, we note that the purpose of section 30(1) is to allow the Town to communicate in an open manner with its solicitors. In our view, the public interest in information subject to the exception does not outweigh that harm.

The Town has redacted information under section 31(1)(l) of the Act, which permits the Town to withhold information that would reveal the security arrangements for a computer system. The information being withheld is the IP address of certain computers utilized by Town employees, as well as security details for electronic equipment used by the Town under agreement with Central Office Equipment.



Town of Gander
100 Elizabeth Drive
Gander, NL A1V 1G7
Ph: (709) 651-2930

The Town has applied section 35(1)(b) and (g) to a small amount of the Town's banking information that could reasonably be expected to disclose (1) financial information of the Town that has, or reasonably is likely to have, monetary value, and/or (2) information that could reasonably be expected to prejudice the financial interest of the Town if it released. Additionally, the Town has also redacted regarding confidential legal settlements and confidential plans that have not yet been made public under section 35 (d), (f) and/or (g) as release of this information would also result in economic harm to the Town. Section 35 is subject to the public interest override provision in section 9 of the Act. In determining not to release this information, the Town has determined that the public interest in release does not outweigh the harm to the Town in release of the banking details, legal settlement information, and confidential plans.

The Town has redacted information pertaining to Central Office Equipment's Toshiba dealer number under section 39(1) as it is confidential business information supplied to the Town the release of which would result in undue harm to Central Office Equipment Limited and/or would result in similar information not being supplied to the public body in the future. Information pertaining to third party business HST numbers is redacted under section 39(2) as it was collected for the purpose of determining tax liability. This is a mandatory exception to disclosure.

Finally, there is a small amount of information redacted under section 40(1) and (4) as it relates to third party credit card information, personal phone numbers and email addresses, and third party signatures.

As required by 8(2) of the Act, we have severed information that is unable to be disclosed and have provided you with as much information as possible.

Please be advised that you may ask the Information and Privacy Commissioner to review the processing of your access request, as set out in section 42 of the Act (a copy of this section has been enclosed for your reference). A request to the Commissioner must be made in writing within 15 business days of the date of this letter or within a longer period that may be allowed by the Commissioner.

The address and contact information of the Information and Privacy Commissioner is as follows:

Office of the Information and Privacy Commissioner
5th Floor, Beothuck Building
20 Crosbie Place
P. O. Box 13004, Stn. A
St. John's, NL. A1B 3V8

OIPC REFUSES TIM'S ACCESS REQUEST TO ITSELF. FILE ATIPP-HOA-2026-38. 14 AUGUST 2026.

SOURCE

- Email from "Murray, Sean" <seanmurray@oipc.nl.ca> to [REDACTED] no Cc, 14 August 2026 16:54:57 UTC which is 2:24 PM NDT. Subject "Your access request ATIPP-HOA-2026-38". SPF, DKIM and DMARC all pass on oipc.nl.ca.
- Body in full: "Dear Mr. Hill, Please see attached response to your access request. Regards, Sean Murray, Director of Research and Quality Assurance, Office of the Information & Privacy Commissioner, 5th Floor, Beothuck Building, 20 Crosbie Place, St. John's, NL, Tel: (709) 729-6309".
- Attachment: Response to Applicant.pdf, 230,531 bytes, 4 pages. Letter dated 14 August 2026, signed Sean Murray, ATIPP Coordinator.
- TITLE NOTE: he signs the EMAIL as Director of Research and Quality Assurance and the LETTER as ATIPP Coordinator. Same person, two roles at the same office.

THE REQUEST AND THE CLOCK

- OIPC states it RECEIVED the request on 12 AUGUST 2026. Answered 14 August. TWO DAYS.
- Seven items, period 1 January 2026 to date of receipt, all concerning the three time extensions granted on SSWB-037-2026: the Department's complete applications, the receipt dates and times, OIPC's decisions and reasons, the statutory authority for accepting the second and third applications made after the s.23(1) fifteen business day period had expired, any s.24 variation, all correspondence with the Department, and any policy or guideline used in assessing s.23 extension applications.

THE REFUSAL

- ITEMS 1 TO 6 REFUSED under s.41(c) ATIPPA 2015: the Speaker, the officer responsible for a statutory office, or the head of a public body SHALL refuse to disclose, in the case of a statutory office as defined in the House of Assembly Accountability, Integrity and Administration Act, records connected with the investigatory functions of the statutory office.
- THEIR REASONING VERBATIM: "Records relating to applications for extending the deadline to respond to an access request are records 'connected to' our investigatory function, and are therefore required to be withheld."
- s.41 IS A MANDATORY EXCEPTION. Their letter says so. If it applies they must refuse.
- ITEM 7 ANSWERED BY POINTING AT PUBLIC MATERIAL. The only responsive records are said to be already on their website: the guidance document "Requesting a Time Extension" and a newsletter article "The Information Desk: Time Extension Applications". PULL BOTH AND PUT THEM ON DISK.

THEY CONCEDE THE CONFLICT ON THE FACE OF THE LETTER

- Verbatim: "the Office of the Information and Privacy Commissioner is the public body to whom you have made your request. Any review in relation to your request by this Office would therefore raise issues of conflict of interest given that this Office would in effect be reviewing its own decision."
- SO THERE IS NO s.42 COMPLAINT ROUTE ON THIS FILE. They say the practical alternative is a s.52 appeal to the Supreme Court Trial Division.

THE DEADLINE

- s.52(2)(a): an appeal must be commenced not later than 15 business days after the applicant is notified of the decision.
- Notified 14 August 2026, a Friday. Day 1 is Monday 17 August. Fifteen business days lands WEDNESDAY 4 SEPTEMBER 2026. Labour Day 7 September falls after and does not affect the count.
- CONFIRM THE COUNT AGAINST THE RULES BEFORE RELYING ON IT. Not legal advice.

OBSERVATIONS, LOGGED NOT ARGUED

- The letter tells him he may wish to contact the Court "regarding procedures for filing an appeal during the Court's restricted operations in light of the pandemic." That is stale boilerplate carried forward in their template. Note it, do not build on it.
- Page 3 of the PDF carries no text layer. Page 4 reproduces s.52 in full. Confirm nothing was missed on page 3 by rendering it.

THE ARGUMENT AGAINST THE REFUSAL, NOT YET MADE AND NOT YET ASSESSED

- The open question is whether deciding a public body's application to extend its own response deadline is an INVESTIGATORY function at all, or an administrative and regulatory one. s.23(2) requires the Commissioner's approval of an extension. That looks like an approval power exercised before any complaint exists, not an investigation.

- NOT ESTABLISHED. Do not assert it as settled. It is the appeal point, and it needs the section read and any case law checked before anything goes to a court.

THE REAL TENSION, FLAGGED SQUARELY

- OIPC currently holds FIVE live matters of Tim's, including the SSWB-037-2026 access complaint filed 11 August and acknowledged 12 August, the PHIA complaint 0120-066-26-009, JGRD 0005-166-26-002, the Gander PB/526/2026 complaint filed 13 August, and 0025-154-26-021.
- An appeal to the Trial Division against OIPC as a public body would run at the same time as OIPC adjudicates those complaints. That is not a legal bar and OIPC's own letter invites the appeal, but the practical effect has to be Tim's decision, not an assumption.
- s.42(6) and (7) bar a complaint once an appeal is commenced, but that bar attaches to THIS request only. It does not touch the SSWB-037-2026 complaint, which is a complaint about the DEPARTMENT, not about OIPC.

WHAT THIS DOES FOR THE SSWB TRACK

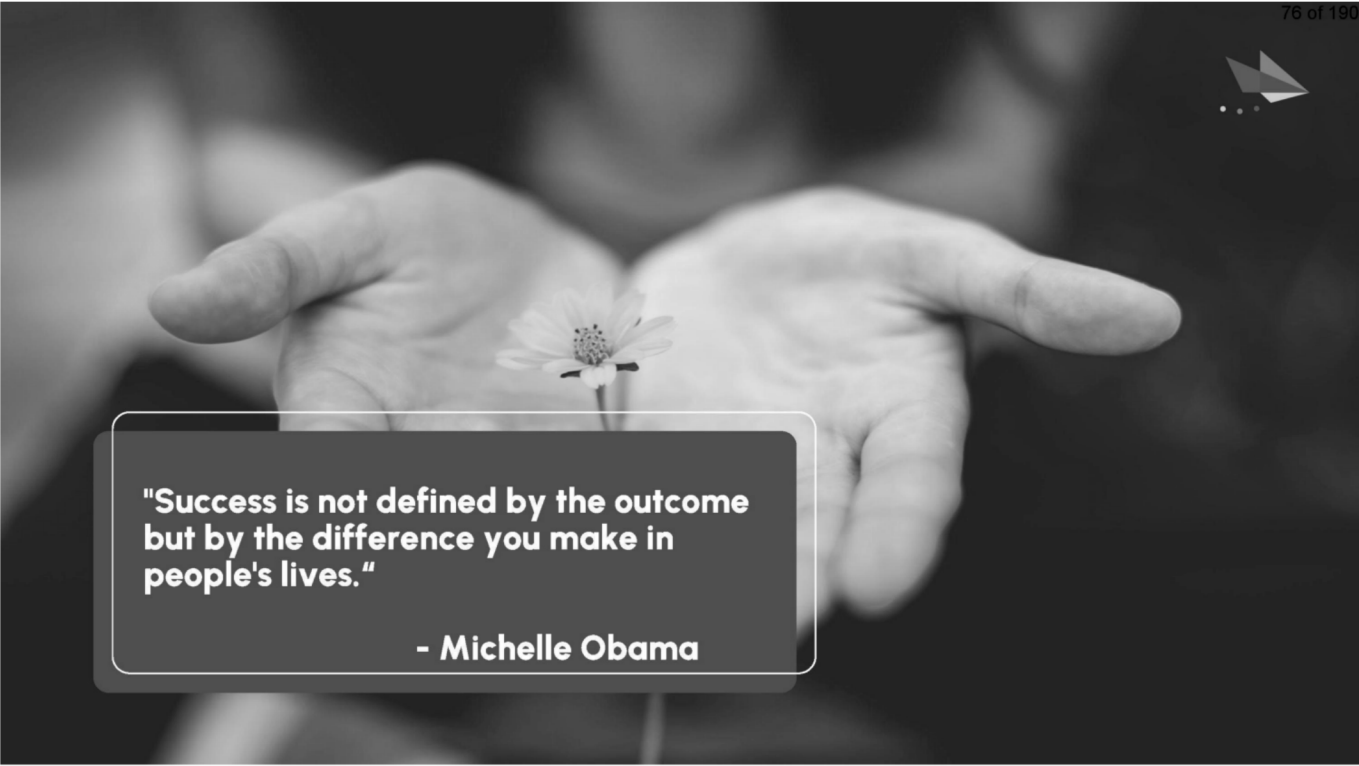
- The extension applications are now confirmed to EXIST and to be held by OIPC. That was previously an inference. Their letter treats them as records they hold and refuses them on a mandatory exception rather than saying there are none.
- The refusal does not answer the underlying question, which is what authority allowed the second and third applications to be accepted after the s.23(1) window had expired. That question is still live inside the SSWB-037-2026 complaint, where the Department is the public body and OIPC is the adjudicator.

FILES

- Save the .eml and Response to Applicant.pdf to W:\Base_Camp\Correspondence\ATIPP\SSWB-037-2026_OIPC_Complaint_Package\ or a new ATIPP-HOA-2026-38 folder.

OPEN

- Decision on a s.52 appeal, deadline about 4 September 2026.
- Pull the two public documents named in the item 7 answer.
- Render page 3 of the PDF to confirm it is blank.



**"Success is not defined by the outcome
but by the difference you make in
people's lives."**

- Michelle Obama



YOUR Community Sector



Community Sector Organizations

- Registered Non-Profits
- Registered Charities
- Volunteer-led Municipalities/LSDs
- Business/Professional Associations
- Social Enterprises / Social Purpose Organizations
- Informal Organizations

The Sector Workforce

- All Volunteers
- Boards of Directors (Unpaid)
- Paid Sector Staff
- Potential New Entrants

Who we don't serve (directly)

- Paid Board Directors
- Paid Municipalities
- Unions
- Academic/Schools
- Hospitals

From: "Ryan, Juliette" <JulietteRyan@oipc.nl.ca>
To: Tim Hill [REDACTED]
Date: Tue, 18 Aug 2026 15:47:02 +0000
Subject: RE: Confirmation of Access Complaint - 0025-154-26-022

Good afternoon,

Thank you for providing your submissions. I will add them to your file and be in touch again once I have received and reviewed the Town's submissions.

As my supervisor explained to you via email on July 22, 2026, we were unable to proceed with complaint 0025-154-26-021 because the Town had received an extension on their Final Response deadline. We closed that file accordingly.

Regards,

Juliette

Juliette Ryan, BA, JD (she/her/hers)
Access and Privacy Analyst
Office of the Information and Privacy Commissioner
5th Floor, Beothuck Building
20 Crosbie Place
PO Box 13004, Station A
St. John's, NL A1B 3V8
Tel. (709) 729-6119
Fax (709) 729-6500
julietteryan@oipc.nl.ca<mailto:julietteryan@oipc.nl.ca>
www.oipc.nl.ca<http://www.oipc.nl.ca/>

[cid:image001.png@01DD2F13.53A26A60]

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From: "OIPC, Commissioner" <Commissioner@oipc.nl.ca>
 To: Tim Hill [REDACTED]
 Cc: "Ryan, Juliette" <JulietteRyan@oipc.nl.ca>
 Date: Wed, 22 Jul 2026 12:57:27 +0000
 Subject: RE: Access Complaint - Deemed Refusal - PB/526/2026 - Town of Gander

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 w\:* {behavior:url(#default#VML);}
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Hello Mr. Hill, Upon further review of your complaint, unfortunately we are unable to proceed with an investigation at this time as the Town was granted a second time extension to respond to the request. The final deadline for a response from the Town is August 19, 2026. A complaint cannot be filed until you either receive a final response to the request, or the final extended deadline has passed without a final response. While it is unfortunate that the Town has not provided you with the proper notice that a second extension was approved, we cannot accept a complaint on that basis alone. Should the Town not provide you with a final response by end of day on August 19, 2026, or if you believe the final response you do receive is insufficient, please resubmit your complaint. Regards, Rebekkah Bourne B.A, J.D (she/her)Senior Access and Privacy AnalystOffice of the Information and Privacy Commissioner20 Crosbie PlaceSt. John'sTel: (709) 729-6329Fax: (709)-729-6500<https://www.oipc.nl.ca>This email and any attached files are intended for the sole use of the primary and copied addressee(s) and may contain privileged or confidential information. Any distribution, use or copying by any means of this information is strictly prohibited. If you received this email in error, please delete it immediately and notify the sender.

From: Tim Hill [REDACTED]; Sent: Monday, July 13, 2026 3:30 PMTo: OIPC, Commissioner <Commissioner@oipc.nl.ca>; OIPC, Commissioner <Commissioner@oipc.nl.ca>; Cc: Tim Hill [REDACTED] ATIPP <atipp@gandercanada.com>; Subject: Access Complaint - Deemed Refusal - PB/526/2026 - Town of GanderCAUTION:This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.Dear Commissioner,Please find attached Access Complaint Form regarding the Town of Gander's failure to respond to my access request, file PB/526/2026.My request was received by the Town of Gander on April 24, 2026. By Advisory Response (Form 3) dated May 7, 2026, the Town confirmed the responsive records "are available." By Notice of Extension (Form 5) dated May 26, 2026, approved by your Office under section 23, the Town extended the time limit and stated it expected to respond by July 7, 2026. As of the close of the government business day on July 7, 2026, I have received no response, no records, and no further notice from the Town. The public body is therefore in deemed refusal.I ask that the Commissioner treat this as a deemed refusal and require the Town of Gander to respond and release the responsive records without further delay.I have attached the completed Access Complaint Form, along with the Town's Form 3 Advisory Response and Form 5 Notice of Extension. I am available for anything further your Office requires, and I ask to be advised of the file number and the assigned analyst.Timothy Pratt Hill [REDACTED] [REDACTED]

Requesting a Time Extension

Purpose

Section 23 of the *Access to Information and Protection of Privacy, 2015 (ATIPPA, 2015)* gives the Commissioner authority to approve an application by a public body for an extension of time for responding to an Access Request. The only extension available to a public body under the *ATIPPA, 2015* is through an application to the Commissioner under this section. These guidelines have been developed in accordance with the principle that individuals who make access to information requests are entitled to a timely response to their requests.

These guidelines set out the criteria and procedure to be used when making an application for an extension of time to the Office of the Information and Privacy Commissioner (OIPC).

Introduction

Section 16(1) of the *ATIPPA, 2015* provides that a public body shall respond to an Access Request without delay and in any event not more than 20 business days after receiving it, unless the time limit for responding is extended by the Commissioner under section 23. A business day is a day that is not a Saturday, Sunday or a holiday as defined in the *Interpretation Act*.

Section 23 allows a public body to apply to the Commissioner for an extension of time to respond to an Access Request not later than 15 business days after receiving the request. The Commissioner is authorized to approve a time extension application where it is considered necessary and reasonable to do so in the circumstances outlined by the public body in its application. The Commissioner has authority to extend for the number of business days that is considered appropriate in the circumstances.

Making a Request for Extension of Time

An application for an extension of time shall be made using the Time Extension Application Form. Given the strict legislated timelines for making and responding to a request for an extension of time, the form should be submitted via e-mail to commissioner@oipc.nl.ca. Public bodies may also contact the Commissioner's Office by telephone prior to sending the e-mail to discuss the matter briefly.

This guidance document will provide assistance in completing the Time Extension Application Form.



Office of the Information and Privacy Commissioner
P.O. Box 13004, Station "A", St. John's, NL A1B 3V8
Telephone: (709) 729-6309 or 1-877-729-6309 Fax: (709) 729-6500
E-mail: commissioner@oipc.nl.ca www.oipc.nl.ca

- Offering all participants career and personal development training opportunities
- Motivating some youth to pursue post-secondary educational goals
- Making life changing opportunities for a few youth by finding them really exciting employment opportunities which might help them shape their futures.

Project Budget – 140 Participants

Program delivery

Salaries (Note #1)	\$ 98,300
MERC/Workers Comp/HR benefits	\$ 14,745
	\$ 113,045

Participant costs

Wages and benefits (Note #2)	\$ 572, 454
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Operational

Fees to host organizations (Note #3)	\$ 85,868
Career Development costs - online /virtual learning (Note #4)	\$ 2,000
Communication to hosts and youth	\$ 2,000
	\$ 89,868

Administrative

Insurance, audit, office supplies, printing, telephone, space, equipment, accounting systems (Note #5)	\$ 15,732
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Total program cost	\$ 791,100
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Notes to Budget

1. Salary costs for design and delivery, management, financial oversight and to partner with IPGS. CSCNL will assign professional staff for high energy implementation of the program.

Tasks will include:

- working with provincial government personnel for referrals of targeted youth who might benefit from the program
- contracting and working with host organizations
- securing job opportunities for students
- monitoring and assessment for continuous feedback and impact
- monitoring career development opportunities within host groups organizations
- arranging regional/external career development and personal growth sessions
- preparation of final report

From: Corey Weir <coreyweir@cscnl.ca>
Sent: Monday, May 4, 2026 5:10 PM
To: Swain, Dawn
Cc: McCarthy, Patti, Lori Johnson, Kyle Wiseman
Subject: Re: EAS Agreement ID: 380529
Attachments: BT - AMPLIFY 2026-27 proposal May-04-2026.pdf

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Hi Dawn,

Please see the adjusted budget for AMPLIFY 2026-27 [REDACTED]

35(1)(d)

When will we receive an agreement for signature? Time is of the essence with summer being almost here and a lot of the youth on this program fall within the usual school schedule.

Cheers,
Corey

--

Corey Weir
Director, Sector Workforce and Capacity
coreyweir@cscnl.ca

Community Sector Council NL
25 Anderson Ave
St. John's, NL A1B 3E4
Tel: 709-753-9860 | Fax: 709-753-6112
Cell: 709-682-7263
Web: <https://cscnl.ca>
Twitter: <https://twitter.com/cscnl>



Connecting People, Organizations and Communities

From: Swain, Dawn <dawnswain@gov.nl.ca>
Sent: Monday, May 4, 2026 9:28 AM
To: Corey Weir <coreyweir@cscnl.ca>
Cc: McCarthy, Patti <PattiMcCarthy@gov.nl.ca>
Subject: EAS Agreement ID: 380529

Hi Corey

I've recently taken on responsibly of overseeing your 2026-2027 Employment Assistance Services (EAS) funding.

25(1)(d)
129

If you have any questions, feel free to reach out to myself or Patti, I've cc'd her above.

Regards

***Dawn Swain
Employment Programs Supervisor
Employment & Training Programs
Department of Jobs, Growth & Rural Development***

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From: Swain, Dawn
Sent: Tuesday, May 5, 2026 10:02 AM
To: James, Maureen
Subject: RE: Financial report (Jan 1 - Mar 31, 2026)

Thank you. [REDACTED] 29(1)(a)

From: James, Maureen <MaureenJames@gov.nl.ca>
Sent: Tuesday, May 5, 2026 9:31 AM
To: Swain, Dawn <dawnswain@gov.nl.ca>
Subject: FW: Financial report (Jan 1 - Mar 31, 2026)

Hi Dawn,

This is the most recent correspondence I have with CSC (AMPLIFY). I asked for supporting documentation for their Jan-Mar 2026 financial report. [REDACTED] 29(1)(a), 35(1)(d)

Maureen

From: James, Maureen
Sent: Monday, April 27, 2026 2:29 PM
To: 'Lori Johnson' <lorijohnson@cscnl.ca>
Cc: Corey Weir <coreyweir@cscnl.ca>; Kyle Wiseman <kylewiseman@cscnl.ca>
Subject: RE: Financial report (Jan 1 - Mar 31, 2026)

Thank you for letting me know, Lori.

Maureen

From: Lori Johnson <lorijohnson@cscnl.ca>
Sent: Monday, April 27, 2026 2:27 PM
To: James, Maureen <MaureenJames@gov.nl.ca>
Cc: Corey Weir <coreyweir@cscnl.ca>; Kyle Wiseman <kylewiseman@cscnl.ca>
Subject: Re: Financial report (Jan 1 - Mar 31, 2026)

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Hi Maureen,

[REDACTED] 40(1) I will respond to your request in the next day or so.

Thank you,

Lori

Lori Johnson – (She/Her)
Director of Finance and Business Operations
lorijohnson@cscnl.ca

From: "Ryan, Juliette" <JulietteRyan@oipc.nl.ca>
 To: Tim Hill [REDACTED]
 Date: Wed, 09 Sep 2026 17:53:02 +0000
 Subject: RE: HPRM: RE: Re[4]: Complaint Update - 0005-166-26-002

Good afternoon,

You should now have access to the majority of the information the Department had previously redacted. If you are unable to access or view the records that the Department most recently sent you via Kiteworks, please let me know and I will follow up with the Department.

You have already agreed to an informal resolution on the 2003 to 2013 reasonable search issue and the issue of whether the Department identified what information it redacted under section 29.

I have reviewed the records in their entirety and can confirm that I agree with the Department's remaining redactions. Further, it has now released pages 130 and 131 of the records package in their entirety to you. Accordingly, I recommend that you now resolve the entirety of your complaint informally. Please confirm to me by September 16, 2026 whether you agree to an informal resolution of your complaint.

If I do not hear from you by tomorrow, September 10, 2026, I will proceed to refer this file to a formal investigation to maintain our legislative deadline. However, we can still reach an informal resolution even after we proceed to a formal investigation.

Please let me know if you have any outstanding questions or concerns.

Regards,

Juliette

Juliette Ryan, BA, JD (she/her/hers)
 Access and Privacy Analyst
 Office of the Information and Privacy Commissioner
 5th Floor, Beothuck Building
 20 Crosbie Place
 PO Box 13004, Station A
 St. John's, NL A1B 3V8
 Tel. (709) 729-6119
 Fax (709) 729-6500
 julietteryan@oipc.nl.ca<mailto:julietteryan@oipc.nl.ca>
 www.oipc.nl.ca<http://www.oipc.nl.ca/>

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From: Ryan, Juliette
 Sent: Thursday, August 27, 2026 1:13 PM
 To: 'Tim Hill' [REDACTED]
 Subject: HPRM: RE: Re[4]: Complaint Update - 0005-166-26-002

Good afternoon,

Thank you for your reply. I will continue to investigate all of the information that the Department withheld.

My reply to your email did not alter the original email I received from you; it merely added my identifiable responses to a section of the email thread in the response I provided to you. I have already added the email I received from you, which did not contain my responses, directly to the file.

Regards,

Juliette

Juliette Ryan, BA, JD (she/her/hers)
Access and Privacy Analyst
Office of the Information and Privacy Commissioner
5th Floor, Beothuck Building
20 Crosbie Place
PO Box 13004, Station A
St. John's, NL A1B 3V8
Tel. (709) 729-6119
Fax (709) 729-6500
julietteryan@oipc.nl.ca<mailto:julietteryan@oipc.nl.ca>
www.oipc.nl.ca<http://www.oipc.nl.ca/>

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From: "Ryan, Juliette" <JulietteRyan@oipc.nl.ca>
 To: Tim Hill [REDACTED]
 Date: Thu, 10 Sep 2026 12:21:21 +0000
 Subject: Notification of Formal Investigation - 0005-166-26-002

Good morning,

Thank you for your prompt response.

Since attempts to resolve this complaint by informal means have been unsuccessful, the file has now been referred to the formal investigation process in accordance with subsection 44(4) of the Access to Information and Protection of Privacy Act, 2015 (ATIPPA, 2015).

The Department has now released all information to you that it had previously withheld under sections 29 and 35 of ATIPPA, 2015, and some of the information it had previously withheld under section 40. You agreed to informally resolve the 2003 to 2013 reasonable search issue and the issue of whether the Department identified what information it redacted under section 29. Accordingly, the following issues have not been resolved:

1. Whether the Department of Jobs, Growth and Rural Development appropriately applied section 31(1)(1) of the Act
2. Whether the Department appropriately applied section 40(1) of the Act

Subsection 43(1) of ATIPPA, 2015, dealing with the burden of proof, provides:

43. (1) On an investigation of a complaint from a decision to refuse access to a record or part of a record, the burden is on the head of a public body to prove that the applicant has no right of access to the record or part of the record.

You provided submissions dated July 27, 2026 and August 7, 2026. We are not seeking further representations from you at this time.

Following a final review of the file, a Report may be issued.
 If you have any questions about this process, please do not hesitate to contact me.

Regards,

Juliette

Juliette Ryan, BA, JD (she/her/hers)
 Access and Privacy Analyst
 Office of the Information and Privacy Commissioner
 5th Floor, Beothuck Building
 20 Crosbie Place
 PO Box 13004, Station A
 St. John's, NL A1B 3V8
 Tel. (709) 729-6119
 Fax (709) 729-6500
 julietteryan@oipc.nl.ca<mailto:julietteryan@oipc.nl.ca>
 www.oipc.nl.ca<http://www.oipc.nl.ca/>

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Category	2025-26 Budget	Requested 2026-27	Details
PROGRAM DELIVERY SALARY/BENEFIT			
Salaries	\$98,300.00	\$91,240.00	3 positions, 1 FT, 2 prorated. Detailed in project description
MERC	\$14,745.00	\$6,932.00	CPP-5.95%, EI-2.282%, assumes vacation is taken
Other HR Rel. Ben.		\$8,942.00	Pension plan-5%, Group Insurance-4.8%
Workers Compensation		\$411.00	rate-.45/\$100
SUB-TOTAL:	\$113,045.00	\$107,525.00	
PARTICIPANT PROGRAM DELIVERY			
Wages			
Incremental Supports	\$572,455.00	\$576,675.00	Based on 130 participants @ \$16.35 (minimum wage) for 5-8 weeks and 25-35 hrs per week
Disability Rel Sup			
SUB-TOTAL:	\$572,455.00	\$576,675.00	
STANDARD			
Professional Fees			
Honoraria			
Participant Career Development	\$2,000.00	\$2,800.00	9-10 virtual sessions on career and personal development on a range of topics including but not limited to: Mindfulness, Building confidence, Networking, Work readiness, and Financial Literacy. Online meeting tool software.
Equipment			
Advertising\Promo	\$2,000.00	\$2,100.00	Communication costs to participants and employers includes internet, cell package, postage costs. Social media advertising
Office Supplies		\$500.00	Various stationary including paper, photocopying, envelopes, pens, highlighters, folders, etc.
Resource Materials			
Materials and Supp			
Other Op/Proj Costs	\$101,600.00	\$101,500.00	Organization (employers) Host fee - 15% of participant wages and benefits (\$86,500). Administration - \$15,000 - includes occupancy costs, insurance, maintenance, auditing/accounting, banking, software, equipment and furniture, website
SUB-TOTAL:	\$105,600.00	\$106,900.00	
EXCEPTIONAL			
Memberships			
Postage and Courier			
Banking Charges			
Legal fees			
Tel/Fax/Internet			
Utilities			
Audit Costs			
Furniture			
Printing			
Conf Reg/Att Fees			

SUB-TOTAL:	\$0.00	\$0.00	
TOTAL:	\$791,100.00	\$791,100.00	