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**Nunavut Information and Privacy Commissioner**  
 Nunavunmi Tuhaqtauyukhaliqinirmun Kanngunaqtuliqinirmun Kamisina  
 Commissaire à l'information et à la protection de la vie privée du Nunavut

## Commissioner’s Final Report

<b>Report Number:</b>	22-221-RR
<b>CanLII Citation:</b>	Department of Human Resources (Re), 2022 NUIPC 12
<b>NUIPC File Number:</b>	22-128
<b>GN File Number:</b>	1029-20-HR13153
<b>Date:</b>	July 6, 2022

### Summary

**[1]** The Applicant applied to Health for certain records related to their employment. Part of the request was transferred to Human Resources. HR gave itself several time extensions, citing a backlog of ATIPP files. As this review neared completion, HR informed the Applicant that no responsive records had been found. The Commissioner finds the time extensions were not reasonable. The Commissioner also finds that HR did not conduct a diligent search. The Commissioner recommends HR undertake a further search for records and respond to the Applicant within a specified period.

### Nature of Review and Jurisdiction

**[2]** This review started as a review of time extensions taken by the Department of Human Resources. The request was filed under section 28(1) of the *Access to Information and Protection of Privacy Act* (ATIPPA). I conducted the review under section 31(1). Later, for reasons explained below, I added to this review the question whether HR conducted a diligent search for responsive records.

**[3]** I have jurisdiction over the Department of Human Resources: ATIPPA, section 2, definition of “public body”.

## Issues

- [4] The issues in this review are:
- a. Were the time extensions taken by the Department of Human Resources “for a reasonable period”?
  - b. Did the Department of Human Resources conduct a diligent search for responsive records?

## Facts

[5] The Applicant is a former casual employee of the Government of Nunavut. For purposes of this review, it is relevant to note that they worked as a casual employee for the Department of Health in a community other than Iqaluit.

[6] On December 21, 2021, the Applicant sent an ATIPP request to the Department of Health. The request was for certain records relevant to their employment in Nunavut. On January 6, 2022, Health transferred a portion of the request to the Department of Human Resources. The Health portion of the disclosure has been completed, and was the subject of *Department of Health (Re)*, 2022 NUIPC 8 (CanLII) and a ministerial decision. It forms no part of this review. This review deals solely with the HR portion of the request.

[7] The transfer from Health to HR stated that the information being requested was “the personnel file of [the Applicant]”.

[8] The transfer request came into HR shortly after a new ATIPP Coordinator started at HR. At the time, HR was backlogged in its processing of ATIPP files, with “more than a dozen pending cases”. The ATIPP Coordinator received some guidance from the Territorial ATIPP Manager about how to set priorities and how to approach the files in the backlog.

[9] On January 10, 2022, the Territorial ATIPP Manager, who tracks ATIPP files across the GN, gave the ATIPP Coordinator a file number (1029-20-HR13153) for the Applicant’s file. He told the ATIPP Coordinator that the statutory deadline for a response was February 11, 2021.

**[10]** On January 12, 2022, the ATIPP Coordinator wrote to the Applicant, acknowledging receipt of the HR portion of the Applicant's request, adding "You will receive a response no later than February 11, 2022".

**[11]** Also on January 12, 2022, the ATIPP Coordinator wrote an e-mail to an HR manager. The purpose of the e-mail was to begin the process of gathering responsive records. The addressee left their position later that month, apparently without having responded to the ATIPP Coordinator.

**[12]** On March 11, 2022, the Applicant wrote to the ATIPP Coordinator, noting that "the 11th" had arrived without any disclosure. (It is not apparent, from the file material I have seen, what happened between February 11 and March 11.)

**[13]** On March 16, 2022, HR sent an extension letter to the Applicant. The letter is signed by the HR deputy minister. The letter cites section 11(1)(b) of the ATIPPA and reads, in part, as follows:

The Department of Human resources is currently facing a backlog in processing ATIPP requests. We require an additional delay of four (4) weeks to complete the processing of your request. We are hoping that you will receive a decision by no later than April 15, 2022.

**[14]** Also on March 16, 2022, the ATIPP Coordinator followed up on their internal e-mail of January 12, 2022, by writing to certain other HR employees. One of the replies was from a manager in the Employee Relations division of HR. The manager asked what the ATIPP Coordinator meant by the term "personnel file", and explained the different things that it could mean.

**[15]** On March 17, 2022, the ATIPP Coordinator wrote to the Applicant asking "Can you tell me exactly what you mean by 'personnel file'? Emails? notes? etc. Perhaps I could begin to collect these documents."

**[16]** On April 13, 2022, HR sent another extension letter to the Applicant. It is substantively the same as the letter of March 15, 2022, and is signed by a new deputy minister. The new deadline was May 13, 2022. In the e-mail to which the extension letter was attached, the ATIPP Coordinator wrote "we have many old

requests that we are currently processing. Your request will be processed as soon as possible”.

**[17]** On May 14, 2022, the Applicant sent an e-mail to the ATIPP Coordinator, noting that they had not received anything by the deadline of May 13, 2022.

**[18]** On May 16, 2022, HR sent another extension letter to the Applicant. It is substantively the same as the letters of March 13, 2022, and April 13, 2022, and is signed by an acting deputy minister. The new deadline was June 17, 2022.

**[19]** In an e-mail to which the May 16, 2022, extension letter is attached, the ATIPP Coordinator wrote

...we are still facing too many requests from ATIPP. Please know that this is in no way the fact that we are taking a long time to process your request, but there are already requests that precede yours that must be resolved first then I will process yours.

Be understanding, we do our best to accommodate everyone, and requesting a review from the [Information and Privacy Commissioner] is your right, but I will always proceed in chronological order.

**[20]** Also on May 16, 2022, the Applicant filed with this office a Request for Review of the time extension. I proposed, and the Applicant agreed, to hold off on the review until the new deadline of June 17, 2022. I was hopeful that HR would disclose records by the new deadline, which would render moot my review of the time extension.

**[21]** As of June 17, 2022, HR had not sent any disclosure to the Applicant. I therefore began to gather information and write this decision.

**[22]** On June 24, 2022, I met with HR’s ATIPP Coordinator and the Territorial ATIPP Manager to discuss the handling of the Applicant’s file, and to discuss the ATIPP workload at HR in general.

**[23]** Later the same day, HR sent to the Applicant a letter stating that no responsive records had been found. The letter is signed by the deputy minister.

Attached to the letter is a “Record of Diligent Search”, which is a narrative record of how the ATIPP Coordinator looked for responsive records.

**[24]** The Applicant was dissatisfied with HR’s response, saying that they found it “hard to believe” that the Department of Human Resources held no responsive records.

## **Law**

### *Time extensions*

**[25]** Section 11 of the ATIPPA lays down the rules for time extensions:

11. (1) The head of a public body may extend the time for responding to a request for a reasonable period where
  - (a) the applicant does not give enough detail to enable the public body to identify a requested record;
  - (b) a large number of records is requested or must be searched to identify the requested record and meeting the time limit would unreasonably interfere with the operations of the public body;
  - (c) more time is needed to consult with a third party or another public body before the head can decide whether or not the applicant is entitled under this Act to access to a requested record;
  - (d) a third party asks for a review under subsection 28(2); or
  - (e) a requested record exists in the control of the public body only in a language other than the Official Language of Nunavut requested by the applicant and additional time is required for translation.
- (2) Where the time for responding to a request is extended under subsection (1), the head of the public body must tell the applicant without delay
  - (a) the reason for the extension;
  - (b) when a response can be expected; and
  - (c) that the applicant may ask for a review of the extension under subsection 28(1).

**[26]** The list of acceptable circumstances in section 11(1) is an exhaustive list. If a case does not fit within one of the five paragraphs, then a time extension is not allowed. Even if a case does fit within one of the five paragraphs, the time extension is limited to “a reasonable period”.

**[27]** In the present case, HR relies on section 11(1)(b). That section lays down two criteria, and both must be satisfied in order to justify a time extension: a large number of records is requested or must be searched, and meeting the time limit would unreasonably interfere with the operations of the public body.

**[28]** In *Department of Education (Re)*, 2021 NUIPC 21 (CanLII) at paragraphs 12 to 16 and paragraph 25, I reviewed the precedents from Nunavut on what “a reasonable period” is. I can summarize the law in one sentence: a time extension of 25 business days, beyond the initial deadline of 25 business days, is the outer limit of reasonableness, and should not be exceeded except in very unusual circumstances.

#### *Diligent search*

**[29]** A public body that receives an ATIPP request is required to conduct a diligent search for responsive records: *Department of Education (Re)*, 2021 NUIPC 10 (CanLII) at paragraphs 23 to 27; see also *Department of Health (Re)*, 2021 NUIPC 20 (CanLII); *Department of Education (Re)*, 2021 NUIPC 22 (CanLII); and *Nunavut Housing Corporation (Re)*, 2021 NUIPC 26 (CanLII).

**[30]** In Ontario, the search required of a public body is described this way: “A reasonable search is one in which an experienced employee knowledgeable in the subject matter of the request expends a reasonable effort to locate records which are reasonably related to the request”: *Municipality of Chatham-Kent (Re)*, 2019 CanLII 108986 (ON IPC) at paragraph 15; *Health Professions Appeal and Review Board (Re)*, 2018 CanLII 74224 (ON IPC) at paragraph 11.

**[31]** A similar but more detailed explanation is given by an adjudicator for the Alberta Information and Privacy Commissioner in *University of Lethbridge (Re)*, 2016 CanLII 92076 (AB OIPC). The adjudicator in *University of Lethbridge* quotes from an earlier Order listing the kinds of evidence that a public body should put forward to show it made reasonable efforts in its search:

- The specific steps taken by the Public Body to identify and locate records responsive to the Applicant's access request
- The scope of the search conducted - for example: physical sites, program areas, specific databases, off-site storage areas, etc.
- The steps taken to identify and locate all possible repositories of records relevant to the access request: keyword searches, records retention and disposition schedules, etc.
- Who did the search
- Why the Public Body believes no more responsive records exist than what has been found or produced

**[32]** I adopt this explanation of the ATIPPA search requirement, along with the stipulation from the Ontario cases that the search should be conducted by “an experienced employee knowledgeable in the subject matter of the request”.

### **Analysis**

**[33]** On one level, this is a simple case. The Department of Human Resources took far too long to respond to the Applicant’s ATIPP request and did not conduct a diligent search for records. The reasons it has given for the time extensions do not comply with section 11(1) of the ATIPPA, and the methods it used to look for records do not satisfy the “diligent search” standard.

**[34]** That could be the end of the story. But the problems with ATIPP processing at HR are chronic. They have reached the point where I need to say more. HR needs to identify and tackle the root problems in its ATIPP processing, or we will keep coming back to the same issues.

**[35]** HR has long been struggling to meet its ATIPPA obligations. As I wrote in a recent decision concerning the Department of Education, “This is not an isolated case, and the situation is not new”: *Department of Education (Re)*, 2022 NUIPC 11 (CanLII) at paragraph 40. In the eighteen months that I have been the Information and Privacy Commissioner, there has been a revolving door of ATIPP Coordinators at HR, including periods where there was no ATIPP Coordinator. Some of the work

done by the ATIPP coordinators at HR in that period was good, and their efforts were occasionally heroic, but ATIPP processing at HR has not been consistent or sustainable.

**[36]** HR receives among the most complex ATIPP requests of any public body. I have written elsewhere that the ATIPP has, in practice, become a proxy battleground for workplace issues within the GN: *Department of Human Resources (Re)*, 2021 NUIPC 19 (CanLII) at paragraph 31.

**[37]** ATIPP files in the HR context are especially difficult when they involve internal workplace issues: *Department of Health (Re)*, 2022 NUIPC 8 (CanLII) at paragraph 19; *Department of Executive and Intergovernmental Affairs (Re)*, 2021 NUIPC 13 (CanLII) at paragraphs 21 to 26; *Department of Human Resources (Re)*, 2021 NUIPC 19 (CanLII) at paragraph 23.

**[38]** Moreover, ATIPP files from HR almost inevitably engage section 23 of the ATIPPA, dealing with the protection of personal information, which I have called the most difficult section in the entire law: *Nunavut Arctic College (Re)*, 2021 NUIPC 17 (CanLII) at paragraph 24.

**[39]** Finally, I note that human resources processes within the GN are byzantine, especially to the outsider or the newcomer, and come with a fearsome amount of jargon. It can take a great deal of time to learn what everything means and how everything works. The same might be said for ATIPP itself.

**[40]** For all these reasons, ATIPP work within the Department of Human Resources would be challenging even for the most experienced and knowledgeable of ATIPP Coordinators. In a slightly different context, I have written that good ATIPP work requires “judgment, and experience, and confidence, and knowledge of the wider interests of the public body”: *Department of Health (Re)*, 2021 NUIPC 12 (CanLII) at paragraph 19.

**[41]** In this case, the ATIPP Coordinator handling the Applicant’s file was new to the GN, new to HR, and new to ATIPP. It is no wonder they ran into difficulties. Having said that, I cannot stress enough that nothing in this decision should be taken as a criticism of the ATIPP Coordinator. The problems with ATIPP processing



at HR long predate the current coordinator's arrival. The coordinator has done rather well, in my view, considering they came without prior experience to one of the most challenging ATIPP jobs in the GN. They inherited a big backlog. They did not, in my view, receive anywhere close to the resources and support they needed to get the job done. They had to learn as they went along.

**[42]** The responsibility for fixing the problems with ATIPP processing within HR lie squarely with the minister and with the department's management.

**[43]** With that background, I now turn to how the Applicant's request was handled.

#### *Time extensions*

**[44]** As noted in the Law section above, section 11(1) of the ATIPPA lays down the complete list of allowable reasons for a time extension. To be allowable, a time extension must fit within one of the paragraphs of section 11(1) and must be for "a reasonable period".

**[45]** The extension letters on the Applicant's file are close to identical. They cite section 11(1)(b), which for ease of reference I repeat here:

11. (1) The head of a public body may extend the time for responding to a request for a reasonable period where

...

(b) a large number of records is requested or must be searched to identify the requested record and meeting the time limit would unreasonably interfere with the operations of the public body; ....

**[46]** Section 11(1)(b) does not, in my view, apply in this case. The Applicant's request was not for a large number of records, nor did it require that a large number of records be searched.

**[47]** The real reason for the delay was the backlog of ATIPP files at HR. But having a backlog is not one of the five acceptable excuses under section 11(1). Nor should it be, since a public body could defeat the objectives of the ATIPPA simply by under-resourcing its ATIPP function.

**[48]** HR's ATIPP Coordinator, who had been left by management to figure things out on their own, decided to deal with the backlog by working on files in chronological order. This approach might have been understandable and fair if there was no access law; but there is an access law, and it sets deadlines.

**[49]** The proper response would have been for HR management to tackle the ATIPP backlog differently, perhaps by borrowing or hiring or contracting ATIPP specialists from elsewhere. Instead, HR management hired a new employee and provided no extra resources or support. They left their new employee to muddle through as best they could.

**[50]** As noted in the Law section above, the outside limit of reasonableness for a time extension is an additional 25 business days. That limit should be exceeded only in very exceptional circumstances, which the present case is not. A public body has a legal obligation to staff and organize its ATIPP function so that it can consistently meet the deadlines in the Act. The ATIPPA is not supposed to be optional. It is the law.

**[51]** I find the time extensions taken by HR did not satisfy the requirements of section 11(1)(b) and were not, in any event, "for a reasonable period".

#### *Search for records*

**[52]** As outlined in the Law section above, a public body is required to conduct a "diligent search" for responsive records.

**[53]** Although the Applicant's file was not a priority, because of its place in the chronological queue, the ATIPP Coordinator did send some e-mails looking for responsive records and did (for the most part) get replies. I have had the advantage of seeing the complete set of internal e-mails. I also have HR's "Record of Diligent Search" that was attached to the deputy minister's letter of June 24, 2022.

**[54]** HR received the ATIPP transfer from Health on January 6, 2022. The wording of the request was simple: it was for "the personnel file of [the Applicant]". (The Applicant's original ATIPP request to Health was more

complicated than that, but the portion transferred to HR was only for “the personnel file” in HR.)

**[55]** As it turns out, searching for “the personnel file” is not as simple as it sounds. From the internal e-mails, it becomes apparent that the ATIPP Coordinator never really came to grips with what they were looking for. That explains, at least in part, why they did not find anything.

**[56]** From the Applicant’s perspective, “the personnel file” covered everything to do with their employment in Nunavut. The Applicant may have believed that there was one file, whether paper or electronic, containing everything touching on their time with the GN. That is not, unfortunately, how the GN organizes itself.

**[57]** It was not until March 16, 2022 – more than two months after Health had transferred the ATIPP request to HR – that an HR manager explained to the ATIPP Coordinator that “the personnel file” could mean a variety of things. This was all part of the ATIPP Coordinator’s learning curve.

**[58]** Before returning to the search for records, I pause to consider the different kinds of GN employee files, and where they are located.

### *Three kinds of employee files*

**[59]** Broadly speaking, a typical GN employee might have three separate files dealing with their employment:

- a. Staffing file
- b. Departmental file
- c. Employee Relations file

There might also be other employment-related records that do not find their way into any of these three main files.

**[60]** The staffing file contains material about the hiring of the employee – for example, the employment application, reference checks, criminal record check, contract, and moving expenses. Much of the GN’s staffing is done through the

Department of Human Resources, but some departments do their own staffing for some positions. The location of the staffing file, then, is not fixed. It could be in HR, or it could be in the department.

**[61]** The departmental file contains material about the work of the employee – for example, information about pay, leave, and discipline. This file is, as the name implies, held by the operating department.

**[62]** The Employee Relations file is held by the Employee Relations division of HR. Not every employee has an Employee Relations file. An Employee Relations division is created when advice or action is sought from the Employee Relations division. That could cover anything from job reclassification to termination.

**[63]** According to the GN Human Resources Manual, the staffing and departmental files are available to a GN employee on request. To see them, an employee just has to ask. There is no need for an ATIPP request.

**[64]** Special rules, however, apply to an Employee Relations file. The ATIPPA was amended in 2017 to add section 25.1:

25.1. The head of a public body may refuse to disclose to an applicant

(a) information relating to an ongoing workplace investigation;

(b) information created or gathered for the purpose of a workplace investigation, regardless of whether such investigation actually took place, where the release of such information could reasonably be expected to cause harm to the applicant, a public body or a third party; and

(c) information that contains advice given by the employee relations division of a public body for the purpose of hiring or managing an employee.

**[65]** I have previously found that this section is broad enough to cover the Department of Human Resources, which offers a wide range employment-related advice to departments: *Department of Human Resources (Re)*, 2021 NUIPC 4 (CanLII) at paragraph 18.

**[66]** Exemption of Employee Relations files is not automatic. To be exempt from disclosure, a record in the file must fit within one of the paragraphs of section

25.1. To correctly claim the section 25.1(c) exemption, for example, there must be something that is genuinely in the nature of “advice”: *Department of Human Resources (Re)*, 2021 NUIPC 4 (CanLII) at paragraph 16. Moreover, section 25.1 is a discretionary exemption, so a public body must turn its mind to whether records should be released, even if the section 25.1 exemption otherwise applies: *Department of Health (Re)*, 2021 NUIPC 12 (CanLII) at paragraphs 14 and 15.

*Search for records (continued)*

**[67]** After the e-mail of March 16, 2022, the ATIPP Coordinator’s language changed. In their internal e-mails, they started asking for “emails, notes, etc.” rather than for “the personnel file”.

**[68]** Unfortunately, a request for “the personnel file” may have been too specific, but this new request was too vague. It is apparent to me, from the internal e-mails, that the recipients did not understand what they were being asked for. A vague request elicited vague replies. The ATIPP Coordinator did not have the knowledge to be more specific, or the experience to know when to press for better answers.

**[69]** For example, two managers within HR responded to the ATIPP Coordinator by saying that they had had no contact with the Applicant, and therefore had no responsive records. That was literally true, but it was beside the point. The real question was whether the managers’ unit had responsive records (which it did), not whether they personally had responsive records (which they did not). The ATIPP Coordinator took the managers’ answers at face value and moved on.

**[70]** The ATIPP Coordinator also contacted HR staff in the region where the Applicant had worked. That is where the Applicant’s staffing file should have been, if staffing had been done by HR rather than by Health. The response was that a staffing file for the Applicant could not be located.

**[71]** By May, the ATIPP Coordinator started asking Health for its records. The Coordinator does not seem to have considered the fact that Health had already responded to the Applicant. The ATIPP file at HR had started with a transfer from

Health. The ATIPP Coordinator at HR should therefore have been looking only for responsive records within HR. At this point, the search was going in circles.

**[72]** In a well-functioning ATIPP system, this search for records would have happened over a few days or perhaps a couple of weeks. Instead, it happened over the course of five months, with long gaps in activity.

**[73]** On June 24, 2022, HR informed the Applicant that no responsive records had been found.

#### *Findings on the search for records*

**[74]** This ATIPP request originated at Health, which responded to the Applicant with 503 pages of records. I reviewed Health's response in *Department of Health (Re)*, 2022 NUIPC 8 (CanLII). The Minister of Health then issued a decision letter under section 36 of the ATIPPA, accepting the recommendations in my Review Report. Health's portion of this ATIPP request is over and done. Nothing in the present decision should be taken as re-opening or revisiting Health's response.

**[75]** The only remaining question is whether HR did a diligent search for records within HR.

**[76]** With respect to the staffing file, I am not satisfied that the questions asked by the ATIPP Coordinator, or the responses received from the HR regional office, were sufficient to establish that HR did not hold a staffing file. In a different case, I would have found that more searching was needed.

**[77]** In this case, however, I have had the advantage of seeing the 503 pages of records disclosed by Health to the Applicant. It appears to me that these 503 pages of records include the Applicant's staffing file, although it is not expressly labelled as such. This makes sense because the Applicant did a kind of work that is normally staffed by Health. I conclude that it is Health, not HR, that holds the staffing file. The Applicant already has it.

**[78]** With respect to an Employee Relations file, I have been able to confirm, during this review, that there is indeed a file for the Applicant held by the

Employee Relations division of HR. The ATIPP Coordinator's search did not find this file, but it exists.

**[79]** I have no evidence whatever that this file was being deliberately withheld. Having reviewed the ATIPP Coordinator's internal e-mails, I can see that the ATIPP Coordinator did not quite know what questions to ask and did not quite understand the gaps in the replies. That is the sort of thing that comes with experience.

**[80]** That does not mean, of course, that the Applicant is entitled to the unredacted file. Now that the file has been located, HR needs to review the records in it for exemptions, particularly under section 25.1. Then it needs to apply its discretion, and release to the Applicant what can be released. Given the history of this file, HR should take these steps without delay.

*A few final words*

**[81]** Earlier this week, I issued Review Report 22-220, which is publicly available as *Department of Education (Re)*, 2022 NUIPC 11 (CanLII). My concluding words in that decision, at paragraphs 38 to 41, can unfortunately be applied almost word-for-word to the present case:

[38] When the Legislative Assembly enacts a piece of legislation, it is the law of Nunavut. It is not supposed to be optional. A law is not a suggestion, to be followed only if circumstances permit.

[39] Unfortunately, the scheme of the ATIPPA in Nunavut includes no consequences for non-compliance. As a result, some public bodies do treat their ATIPP obligations as optional – not every day, and not on every file, but too often. If the legislation is not amended to provide some consequences for non-compliance, we can expect to see more files like this one.

[40] The GN also needs to give serious consideration to re-organizing its ATIPP function so that ATIPP responses are consistent and reliable. In the present case, the ATIPP function at Education completely broke down. This is not an isolated case, and the situation is not new. Perhaps the time has come to revisit the notion that each public body is capable of doing its own ATIPP processing.

[41] Applicants deserve better. Nunavummiut deserve better. As I wrote a year ago in *Department of Education (Re)*, 2021 NUIPC 22 (CanLII) at paragraph 23, the department cannot go on like this. Or maybe it can. That is up to the minister, the Executive Council, and the Legislative Assembly.

**[82]** The two cases show the ATIPP function breaking down inside two different GN departments. The situation is one of neglect, not defiance, but the result is the same – the work is not done, and the purposes of the ATIPPA are defeated.

**[83]** This is not an isolated case. The ATIPP problems within the Department of Human Resources are chronic and will continue unless changes are made, either to the legislation or to ATIPP administration or both.

### **Conclusion**

**[84]** The time extensions taken by the Department of Human Resources were not “for a reasonable period”.

**[85]** The Department of Human Resources did not conduct a diligent search for responsive records.

### **Recommendations**

**[86]** **I recommend** that the Department of Human Resources review the Applicant’s Employee Relations file for exemptions (if any), actively exercise its discretion as required by law, and then release non-exempt records to the Applicant within 30 days of the minister’s decision under section 36 of the ATIPPA.

**[87]** **I recommend** that the Department of Human Resources devote more resources, by whatever means necessary, to reduce its backlog of ATIPP files to zero before the end of 2022. For greater certainty, “zero backlog” means there is no ATIPP file still open in HR more than 50 business days after HR received the request for records.

Graham Steele

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