

2014 July 02

ATIPPA Review Committee Office

Suite C

83 Thorburn Road

St. John's, NL A1B 3M2

Electronic Submission [_info@parcnl.ca](mailto:info@parcnl.ca)

Supplemental to my June 20, 2014 – Submission

WITHOUT PREJUDICE

Further to my Submission of June 20, 2014, I have been following the Privacy Review hearings updates.

I am rather confused with the information presented by Commissioner Ring.

June 11, 2012

A news release indicated the Commissioner needed to review the amendment:

"I will not be in a position to engage in discussion on the amendments until I am fully briefed and read-in. It will be necessary to take some time for in-house analysis and discussion to fully explore the long term effects and implications of the changes before speaking about them.

<http://www.releases.gov.nl.ca/releases/2012/oipc/0611n10.htm>

June 13, 2012

The Telegram published an article regarding the Commissioner's ability to review documents post Bill 29. Indicating how restrictive the OIPC's access would be.

Proposed changes to the province's access-to-information laws would reverse a Newfoundland and Labrador Court of Appeal decision that gave the province's information and privacy commissioner access to government documents.

The amendment in Bill 29 would take away the commissioner's right to review documents that the government withheld from the public claiming client-solicitor privilege — a power the commissioner won in a court battle last fall.

<http://www.cbc.ca/news/canada/newfoundland-labrador/access-to-information-reform-to-overturn-court-decision-1.1147313>

The Telegram printed an article regarding that court decision (my Access Request) and the commentary of the Commissioner:

"Without having the information provided to us, then there was no way that this office could fulfill its mandate and provide an independent review," he said.

<http://www.cbc.ca/news/canada/newfoundland-labrador/n-l-commissioner-wins-appeal-to-see-documents-1.1102852>

June 18, 2012

The Telegram published an article and Commissioner Ring made the following statement:

Ed Ring, who is also the province's privacy commissioner, said Monday that the bill does not stop the Access to the Information and Protection of Privacy Act from doing its job.

"I still maintain, based on my review, that the legislation remains robust, and that people's right to access information will be protected," Ring told reporters Monday, after he spoke at a St. John's conference on public access to government information.

<http://www.cbc.ca/news/canada/newfoundland-labrador/information-commissioner-still-confident-after-bill-29-1.1193797>

I do recall reading that article in 2012 and I was rather confused by his response.

Bill 29 was perhaps, the most tumultuous piece of legislation introduced in the Newfoundland and Labrador House of Assembly. The ensuing filibuster is a testament to the strong opposition it endured and speaks to the very essence of the integrity of the Governing power. Amidst a litany of objections and notable arguments, there was a valiant attempt to impede this archaic legislation into law. But, in the end the numbers were just not there to defeat this piece of legislation.

I was somewhat bewildered by Commissioner Ring's statements in 2012. Now in 2014 some 2 plus years later, he was quite adamant in his presentation to the Privacy Review Committee.

There have already been submissions before this review committee referencing perhaps some political interference in the ATIPPA process. In preparing this supplemental submission, I could not help but note the following:

On June 21, 2012 – Mr. Ed Ring was reappointed as the Privacy Commissioner

The Honourable the Deputy Government House Leader (Mr. King) gave notice that he would on tomorrow ask leave to move the following Resolution:
“WHEREAS section 42.1 of the *Access to Information and Protection of Privacy Act* provides that the Information and Privacy Commissioner is to be appointed by the Lieutenant-Governor in Council on a resolution of the House of Assembly;
AND WHEREAS section 42.2 of the Act states that a commissioner may be reappointed;
AND WHEREAS the appointment of the current commissioner, Mr. Ed Ring, expires on June 23, 2012;
AND WHEREAS it is proposed that Mr. Ring be reappointed as the commissioner for a term of 2 years;

(attachment -PDF document – June 2012 appointment of Ed Ring)

Looking back, perhaps one can speculate as to the reasoning for the Commissioner's commentary of June 18, 2012. However, his reappointment for a further 2-year term just (3) days later is certainly dubious and optically, it is quite concerning.

On June 16, 2014, Commissioner Ring made a submission of 99 pages outlining a number of recommendations and revisions. The contents of which are in stark contrast to his assertion that the legislation was robust enough back in 2012.

One notable change requested certainly is most decidedly curious:

30. Amend the ATIPPA to make the term of office of the Information and Privacy Commissioners a six year term.

It seems, perhaps, too ambitious and beyond the mandate or scope of the Reviewing Committee to engage in an effort to determine the rationale for this sudden metamorphosis. However; it is most assuredly important for the review committee to be apprised of.

Political appointments are always rife with cynicism. Simply put, sometimes they just don't pass the smell test.

Respectfully submitted (electronically),

Deborah S. Moss



Section 30

Attachment – PDF document

Thursday, June 21st, 2012

The House met at 1:30 o'clock in the afternoon pursuant to adjournment.

The Member for Bonavista North (Mr. Cross) made a Statement to recognize and congratulate Emerson Cooze upon his retirement from teaching.

The Member for Torngat Mountains (Mr. Edmunds) made a Statement to congratulate the faculty, staff and pupils of Northern Lights Academy for being the Gold Winner in MMSB's "Top Your Total" School Contest.

The Member for Kilbride (Mr. Dinn) made a Statement to pay tribute to the late Ed Janes.

The Member for Humber West (Mr. Granter) made a Statement to congratulate Mr. Ed Flood for being awarded the Ron Healey Memorial Award.

The Honourable the Minister of Intergovernmental Affairs (Mr. McGrath) made a Statement to recognize National Aboriginal Day.

The Honourable the Minister of Education (Mr. Jackman) made a Statement to recognize this day as the end of the school year and wish all school children a safe and happy summer.

The Honourable the Government House Leader (Mr. Kennedy) gave notice that he would on tomorrow move, pursuant to Standing Order 11, that the House not adjourn at 5:30 o'clock in the afternoon and that the House not adjourn at 10 o'clock in the evening on Tuesday, June 26th, 2012.

The Honourable the Deputy Government House Leader (Mr. King) gave notice that he would on tomorrow ask leave to move the following Resolution:

“WHEREAS section 42.1 of the *Access to Information and Protection of Privacy Act* provides that the Information and Privacy Commissioner is to be appointed by the Lieutenant-Governor in Council on a resolution of the House of Assembly;

AND WHEREAS section 42.2 of the Act states that a commissioner may be reappointed;

AND WHEREAS the appointment of the current commissioner, Mr. Ed Ring, expires on June 23, 2012;

AND WHEREAS it is proposed that Mr. Ring be reappointed as the commissioner for a term of 2 years;

Thursday, June 21st, 2012

NOW THEREFORE BE IT RESOLVED that Mr. Ed Ring be reappointed as the Information and Privacy Commissioner for a term of 2 years”.

The Honourable the Minister of Fisheries and Aquaculture (Mr. King) answered Question No. 6 placed on the Order Paper of March 26th, 2012 by the Member for St. Barbe (Mr. Bennett) respecting the quantity of fish products exported from the Province.

The Member for Burgeo – La Poile (Mr. Parsons) presented a Petition from certain residents of the Province calling upon the House of Assembly to urge Government to support the users of Route 480 in their request to obtain cellular phone coverage along Route 480.

The Member for St. John’s North (Mr. Kirby) presented a Petition from certain residents of the Province calling upon the House of Assembly to urge Government to include all Early Childhood Educators in Newfoundland and Labrador in the Early Learning and Child Care Supplement.

The Honourable the Government House Leader (Mr. Kennedy) moved, pursuant to Standing Order 11 that the House not adjourn at 5:30 o’clock in the afternoon and that the House not adjourn at 10 o’clock in the evening.

The Speaker put the question on the motions that the House not adjourn at 5:30 o’clock in the afternoon and at 10 o’clock in the evening.

The Speaker declared the motions carried.

By leave, pursuant to notice and on motion debate commenced and concluded on the following Resolution standing in the name of the Honourable the Deputy Government House Leader (Mr. King):

“**WHEREAS** section 42.1 of the *Access to Information and Protection of Privacy Act* provides that the Information and Privacy Commissioner is to be appointed by the Lieutenant-Governor in Council on a resolution of the House of Assembly;

AND WHEREAS section 42.2 of the Act states that a commissioner may be reappointed;

AND WHEREAS the appointment of the current commissioner, Mr. Ed Ring, expires on June 23, 2012;

AND WHEREAS it is proposed that Mr. Ring be reappointed as the commissioner for a term of 2 years;

Thursday, June 21st, 2012

NOW THEREFORE BE IT RESOLVED that Mr. Ed Ring be reappointed as the Information and Privacy Commissioner for a term of 2 years”.

The Speaker put the question on the Resolution and declared the Resolution carried.

On motion of the Honourable the Government House Leader (Mr. Kennedy) the House resolved itself into a Committee of the Whole House.

The Speaker left the Chair.

Mr. Verge took the Chair of Committee of the Whole House.

On motion the Committee rose.

The Speaker resumed the Chair.

The Chairperson of the Committee of the Whole House (Mr. Verge) reported that the Committee of the Whole House had considered the matters to them referred and had directed him to report that they had passed a Bill entitled “An Act To Amend The Fatalities Investigations Act” (Bill No. 33) without amendment and a Bill entitled “An Act To Amend The Labour Relations Act” (Bill No. 37) with an amendment.

The Chairperson of the Committee of the Whole House (Mr. Verge) further reported that the Committee of the Whole House had made some progress on a Bill entitled “An Act To Amend The Public Service Collective Bargaining Act No. 2” (Bill No. 38) and asked leave to sit again.

On motion the report of the Committee was received and adopted and on motion it was ordered that Bill No. 33 be read the third time on tomorrow.

The amendment to Bill No. 37 having been read the first and second time, on motion it was ordered that Bill No. 37 be read the third time on tomorrow.

Pursuant to order and on motion debate commenced and concluded on Second Reading of a Bill entitled “An Act To Amend The Assessment Act, 2006” (Bill No. 34) and on motion it was ordered that Bill No. 34 be now read the second time.

Pursuant to order and on motion the Bill entitled “An Act To Amend The Assessment Act, 2006” (Bill No. 34) was read the second time and on motion it was ordered that Bill No. 34 be referred to a Committee of the Whole House on tomorrow.

Thursday, June 21st, 2012

Pursuant to order and on motion the following Bills were read the third time and passed:

A Bill, “An Act To Amend The Fatalities Investigations Act” (Bill No. 33);

A Bill, “An Act To Amend The Labour Relations Act” (Bill No. 37).

On motion it was ordered that the said Bills be passed being entitled as above and that they be submitted to His Honour the Lieutenant Governor for his Assent.

It was moved and seconded that when the House rose it would adjourn until tomorrow, Tuesday, June 26th at 1:30 o'clock in the afternoon.

On motion the House then adjourned accordingly.

William MacKenzie,
Clerk of the House of Assembly.

2014 June 20

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Electronic Submission [-info@parcnl.ca](mailto:info@parcnl.ca)

WITHOUT PREJUDICE

In response to the Committee's request for submissions, I would like to offer the following:

In December 2008, having exhausted all efforts to have a meaningful meeting with my employer/Department of Justice in an attempt to ascertain some relevant information pertaining to issues regarding my employment – I embarked on seeking information via ATIPPA application/s.

Little did I suspect that this quest for information would not only be refused but apparently become the catalyst for the introduction of Bill 29.

Initially, when the Government refused my access request citing "solicitor/client privilege" I was surprised. With no legal proceedings or ongoing litigation – the refusal seemed unqualified/unquantified. However; I felt confident that the OIPC office would be able to obtain the file and rectify this refusal in short order. My surprise quickly turned to shock when I learned that the OIPC had also been refused the information in its entirety. Ironically, in the course of this court battle the Department of Justice breached my privacy by neglecting to omit my personal information from documents at Supreme Court. I personally attended the Supreme Court - Registrar's Office and noted that my information had been crossed out with a marker (which I understood took place in court when it was discovered). By raising the document to the light, I could clearly observe my own personal information.

I made a complaint to the OIPC, which was validated and their office provided recommendations to the Department of Justice to avoid such further breaches.

Link to Supreme Court Cases:

<http://www.canlii.org/en/nl/nlsctd/doc/2010/2010nlt31/2010nlt31.html?searchUrlHash=AAAAAQAUcHJpdmFjeSBjb21taXNzaW9uZXIAAAAAAQ>

AND

<http://www.canlii.org/en/nl/nlca/doc/2011/2011nlca69/2011nlca69.html>

Following the court cases, the OIPC provided me with an opportunity to respond, here is a copy of my response prior to completing their report.

MOSS RESPONSE – FILE 1011.09.01; PB # JUS/1/2009

While I know it is neither required nor necessary for me to divulge the rationale for my access request, I offer it freely:

BACKGROUND

In September 2005 I experienced a traumatic event while employed with the Department of Justice/RNC. I was subsequently diagnosed with PTSD (Post Traumatic Stress Disorder). In the aftermath of that incident, I sought resolution with a view to restore some normality into both my professional and personal life. With a hope to move forward toward healing.

I met with then Chief Joe Browne, who committed himself and his office to seeking a remedy for me. This stated commitment did not manifest itself into anything tangible.

Mr. Joe Anthony, Human Resource Director RNC was also a party to this stated resolution – his role was difficult to interpret as he stated at one point he was the solicitor for the RNC. Unfortunately, his stated commitment also fell short of resolution. I never heard from either of them again.

I spoke with Minister Tom Osborne (Minister of Justice at the time) who also committed to a resolution and suggested I meet with former Deputy Minister Don Burrage (currently Supreme Court Judge) – this meeting never took place – as Mr. Burrage refused to meet with me.

I requested to speak with Minister Jerome Kennedy (former Minister of Justice) he refused to meet with me and I never did receive a call back from his office. My email to the Minister was never responded to.

In the absence of any meaningful response and refusal to meet with me to discuss my tenuous situation – I believe my efforts were in vain. It was at this juncture that it became painfully apparent that no one from the Department of Justice would meet with me. My hopes for normalization and remedy seemed unobtainable.

At the request of the Royal Newfoundland Constabulary Association -former lawyer, Jim Walsh (now Provincial Court Judge) was delegated to open a line of communications. It is difficult to determine Mr. Walsh's success as it did not translate into any positive action/resolution only continued avoidance.

Later, Mr. Randy Earle was engaged in an effort to file a grievance on my behalf only to be denied by the Department of Justice.

ACCESS REQUEST – DECEMBER 2008

Subsequently, I made my access application in December 2008. I felt and continue to believe that I should be granted complete access to that file.

On initial application, I was denied any access, citing client/solicitor privilege.

I immediately felt that this denial was a flagrant refusal and a blatant contravention of the ATIPPA, therefore, I filed an appeal.

It continues to be my assertion that my file was/is a **HR file**. I have not entered into any legal proceedings in relation to this file. It was the Department of Justice who is hiding behind the client/solicitor privilege. As most employees at the Department of Justice are lawyers, I believe this denial was inappropriate and failed to adhere to the provisions of the Act. It appears to be a deliberate and intentional act to deny me access to my own information.

Upon learning of the denial and that the DOJ had sought judicial protection through the Supreme Court of NL; I was somewhat blindsided by this action. I then attended the Registrar's office of Supreme Court and viewed the documents filed by Mr. Don Burrage, on behalf of the DOJ. Ironically, I noted that the documents filed by the DOJ breached my privacy by containing information which could lead to my identity – so, in essence, they breached my privacy in order to protect their own.

I then made a complaint of this privacy breach to the OIPC, I was later informed that the OIPC had advised DOJ of the breach and subsequent recommendations were made.

While their bid to block access was successful at the time, the OIPC did file an appeal and ultimately the Court of Appeal ruled in favour of the OIPC in October 2011.

MAY 2012

Months and several email requests later, I finally received a package from DOJ (some 3 years after my initial application).

RELEASED INFORMATION

Upon reviewing the package, I was extremely disappointed.

Of the documents released, there were numerous blank pages; some pages appeared to be copied with “post-it” notes over the body of the information thereby rendering the document unreadable. The bulk of the package received contained policy and procedures most of which are easily accessible from the Government of NL website – which certainly is not governed by client/solicitor privilege.

I was rather disturbed to note a hand-written reference in the margin **“frivolous and vexatious”**

As stated earlier, my request for information came on the heels of my efforts to seek resolution for an array of employment issues. I do not consider my need to continue my employment in a meaningful and respectful manner neither frivolous nor vexatious.

WITHHELD

The majority of the documents were withheld. It is noteworthy to mention, that of the items listed there is no reference to any legal proceedings.

MISSING

As I reviewed the package, it quickly became apparent that items were missing. Correspondence I had sent to the DOJ was not included nor was it listed as an item withheld. Undoubtedly in this instance the DOJ could not cite client/solicitor privilege over these documents.

In relation to missing documents, there is no assurance that in this file, or perhaps any other file, documents could not be vetted and possibly destroyed prior to release to an individual and/or the OIPC. I could not help but wonder what assurances and safeguards are in place to protect the integrity of the file – I do not believe there are any.

EXTRAORDINARY MEASURES

It appears that the DOJ went to extraordinary measures in an effort to withhold my personal file and information. These measures certainly contradict the boasting of “Transparency and Accountability” that has become the hallmark of this Government.

Due to the extreme measures exercised by the DOJ to halt the release of my documents, I was somewhat concerned as to the unorthodox manner in which my employer was conducting themselves.

Later, I was informed by the OIPC that their efforts to access my file were denied. Following this latest blockade - I was somewhat concerned as to the OIPC's ability to conduct a thorough review given their impediments. What then became highly suspect was the contents of the file and the outstanding effort afforded its protection.

BILL 29

Amidst the filibustering which dominated the House of Assembly concerning the introduction of Bill 29, I could not help but wonder – was I the catalyst for the introduction of such archaic legislation? The timing is certainly suspicious.

The reappearance of the words “frivolous and vexatious” in Bill 29, caused me to believe there may be a connection.

In closing, I give thanks for this opportunity to provide this submission. I feel my Access Request and subsequent refusal was inappropriately handled by the DOJ. As well, it appears the DOJ abused their authority, implemented unnecessary blockades and ultimately changed legislation all in an effort to preclude me from accessing my information.

Even after the October 2011 Court of Appeal decision, the DOJ continued to exercise complete autonomy over the contents of the file with total disregard for the judicial process.

What is further disconcerting is that I am an employee of the DOJ – this certainly has caused irreparable damages to me on many levels and most certainly and understandably has alienated me from my employer even further. This certainly defies any resemblance to a respectful and harassment free workplace.

This appears to be a continuum of what first lead me to file my initial access request and which continues to remain “unresolved”.

Deborah S. Moss



Section 30

(Electronically Submitted)

2012 December 03

The OIPC completed their report on this Access Report see link:

Access Request Report 2013-004

<http://www.oipc.nl.ca/pdfs/A-2013-004DOJ.pdf>

Since the inception of ATIPPA, I have availed of this procedure to seek information. Information that was not readily available to me as I sought answers. When I did obtain the partial records provided – it was/is extremely disconcerting to see hand written notations and emails with derogatory remarks:

- We are quite familiar with Ms. Moss and her access requests
- Frivolous & Vexatious
- Etc...

Undoubtedly, no one anticipated that I would ever have the opportunity to read their commentary and untoward remarks. What is however troubling is that I have absolutely no assurance that documents had not been severed/vetted from the file.

As stated within my response to the OIPC, the Department of Justice went through extraordinary means to preclude me from access to my information. What assurances does anyone have that information is not vetted from a file. In my particular case, documents which I tendered to the DOJ did not resurface. The file was not inventoried – there is no way to verify that the information exists in totality. An applicant must rely on the ATIPPA Coordinator of each department/agency for fulfillment of the request – undoubtedly this opens itself to subjective criticism by the mere nature of its structure. Forgive my cynicism – but it was the DOJ-ATTIPA Coordinator who penned the disparaging remark “we are quite familiar with Ms. Moss and her access requests”. Having read those comments, I was less than confident that the Coordinator was fulfilling his responsibilities as set out in the Legislation:

Duty to assist applicant

9. The head of a public body shall make every reasonable effort to assist an applicant in making a request and to respond without delay to an applicant in an open, accurate and complete manner.

SNL2002 CHAPTER A-1.1 ACCESS TO INFORMATION AND
PROTECTION OF PRIVACY ACT

SUBSEQUENT ATIPPA REQUESTS

In a subsequent request, I sought “hand written notes” that were referenced in a report. Notes authored by the RNC’s HR Director (coincidentally - currently a solicitor with the Department of Justice). I was told that they were “transitory records” and had been disposed of. These transitory records dealt with unresolved employment issues which one would anticipate and expect to be contained within my Personnel File. I also learned that the HR Director had not tendered his “Manager’s Journal “as required per RNC Policy. I was merely told they do not exist and no one could offer any information on their disposition - this is extremely disconcerting not knowing their whereabouts.

(In reference to the hand-written note/s access request, I have attached the relevant RNC Policy and my correspondence regarding same as Attachment 1 and Attachment 2)

LEGIBILITY

In one particular instance, the information I received in response to an Access Request was of such poor penmanship, I was unable to decipher the information. Hence, rendering the documents incomprehensible. There is no provision for the author to make a legible copy or transcribe into a useable format.

APPEALS/REVIEWS

It appears that only, when an appeal or request for review is made does the OIPC make a determination that the request has been completed. For example: I made a review request and the OIPC analyst was able to obtain the information only when the documents were reviewed by them. So, in essence, the ATIPPA Coordinator is policing themselves. If the information is missed, the Department is provided with further recommendations to be more diligent in their searches. There are no ramifications for errors or omissions. With such little accountability it is most assuredly lackluster legislation.

TRANSITORY RECORDS

I’ve discovered this is– the depository of the unknown. The Respondent can label records as “transitory” and they disappear into the abyss.

ATTIPA & BILL 29

The Government of Newfoundland were extremely pro-active when they set about to introduce the concept of an “Open and Transparent Government”. The ATTIPA became a hallmark of a Government that projected itself as an honest and accountable entity. Initially, it seems that their efforts were ambitious and noble. However; when challenged by their own legislation and incurring a subsequent

defeat in Supreme Court, it seems at this juncture they chose to shut down the openness with the introduction of Bill 29.

It is truly a sad commentary that this current Review of Bill 29 is not about an open and transparent Government, but it has become a launching pad for a Provincial election. It appears to be a feeble attempt to appease a disillusioned and outraged public in a desperate bid to garner public support for a has-been political party.

I for one have not been fooled by the optics of such grand-standing. I know only too well how systemically dysfunctional the process is and how easily it can be manipulated.

Regardless of the final actualization of any Privacy Review, the ATTIPA legislation under:

Part III/Exceptions To Access - is robust enough to fend off any challenges by merely claiming the documents requested are covered under one of these specified categories and are off-limits. The Government can quite simply invoke privilege and deny any request.

Respectfully submitted (electronically),

Deborah S. Moss



Section 30

Attachments 1 & 2

2013 November 4

Ms. Stacey Grant

OIPC

Re: OIPC File 0010-060-13-011

Via: Electronic Submission

Ms. Grant,

I've received/reviewed correspondence from DOJ dated October 28, 2013 (of which a copy was sent to you).

In response to your email of November 1, 2013 – I am not satisfied with the response from the Public Body.

Their reply provides little in the way of an understanding of where the handwritten notes are or the disposition of them. The reference to “transitory records” is quite ambiguous and requires clarification.

In relation to the notes of Mr. Joe Anthony in his role as HR Director at RNC (at times he represented himself as “legal counsel”) these notes fall under the Policies and Procedures of the RNC. It is clearly defined under: *Part 7 – Chapter C – Police Note Books* the requirement for notebook retention. In particular, Section 6 & 7. (A copy of this policy is attached for ease of reference).

The notes were of obvious significance that Mr. Anthony took the time to type them and forward them to the DOJ for insertion into their file referenced “Conflict – Restricted Access - # 5500-10-55”. The contents of which are inclusive of disparaging comments and opinions.

Reflecting back to my few conversations with Mr. Anthony, he was highly suggestive that I retain my own legal counsel and he clearly articulated his own lawyer status on several occasions. Given these parameters, one would anticipate that he would be fully cognizant of the need for retention of such important documentation in its original format and the adherence to the RNC Policy and Procedures. It is still not clear why these notes did not find their way into my employment/personnel file. Nor why he failed to adhere to the stated policy.

In closing, I am once again requesting information pertaining to the disposition of any/all information, notes, letters, and emails authored/received by Mr. Joe Anthony during his tenure with the RNC and any subsequent follow-ups in his new position as solicitor, Department of Justice. As stated earlier and again, the contents are of a significant importance and contain extremely sensitive information pertaining to myself – I feel my right to privacy has been breached and I need to know why. I am requesting the OIPC to continue with a formal investigation into these breaches.

Deborah Moss

Attachments: RNC Policy Part 7 Chapter C – Police Note Books.