Order F20-33

BOARD OF EDUCATION OF SCHOOL DISTRICT NO. 39 (VANCOUVER)

Laylí Antinuk
Adjudicator

July 31, 2020

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Summary: The Vancouver School Board requested authorization under s. 43(b) to disregard four access requests made by the respondent because they were frivolous and vexatious. The adjudicator declined to provide the requested authorization for the requests, finding them neither frivolous nor vexatious.

Statutes Considered: *Freedom of Information and Protection of Privacy Act*, s. 43(b).

INTRODUCTION

[1] The Board of Education of School District No. 39 (Vancouver) (the School Board) applied to the Office of the Information and Privacy Commissioner (OIPC) for authorization to disregard the respondent's four outstanding access requests under s. 43(b) of the *Freedom of Information and Protection of Privacy Act* (FIPPA).[1] The School Board wants to disregard these requests because it asserts they are frivolous and vexatious. Section 43(b) gives the OIPC the power to authorize public bodies to disregard frivolous or vexatious access requests.

[2] Both parties made submissions for this application.

ISSUE

[3] In this application, I will decide whether to authorize the School District to disregard the respondent's four access requests because they are frivolous or vexatious under s. 43(b).

[1] The School Board also requested an investigation under s. 42. Section 42 investigations flow from a written complaint or request for review respecting allegations that a public body has contravened FIPPA in some way. The OIPC does not investigate access applicants under s. 42.

[4] Previous decisions have established that the School Board has the burden of proof under s. 43.[2]

[5] Taken together, the parties made fairly extensive arguments and submissions for this application. I have carefully read all this material; however, in these reasons, I will not attempt to go through all of it. Nor will I reiterate all of what the parties have ably stated in their submissions. Instead, in coming to my conclusions, I will focus only on what I find important to the specific issue at hand.

DISCUSSION

Background

[6] The respondent requested information related to a workplace investigation (investigation) into allegations that elected School Board trustees had bullied and harassed School Board employees. The respondent also requested information related to himself and to the School Board's freedom of information office. The School Board alleges that the respondent colluded with another person (applicant A) in making the four requests at issue in a manner that abuses FIPPA and is frivolous and vexatious.[3]

Applicant A, request A and inquiry A

[7] Applicant A worked as an elected trustee of the School Board and was one of the individuals investigated in the investigation.[4] Ultimately, the investigator concluded that applicant A and other trustees had bullied and harassed School Board employees.

[8] As part of the investigation, the investigator retained by the School Board conducted witness interviews during which she took notes (interview notes). Upon completion of the investigation, the investigator prepared a report of her findings. The School Board publicly released a redacted copy of the report citing public interest in the investigation, but it did not release the interview notes publicly.

[9] Applicant A then made an access request (request A) under FIPPA. She requested:

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[2] For example, Order F17-18, 2017 BCIPC 19 at para. 4.
[3] Director's Affidavit at para. 5; School Board's initial submission at paras. 3-4.
[4] The information summarized in the remainder of this paragraph and paragraphs 8-13 comes from the Director's Affidavit at paras. 4, 8-11, 14-19, 22 and Exhibit F.

> A complete, un-redacted copy of the notes [the investigator] took in the course of conducting the recent School District investigation, including the notes – in their entirety – from all witness interviews.

[10] Upon receiving this request, the School Board sent notices to the third party witnesses (witnesses) the investigator had interviewed.[5] Following consultations with the witnesses, the School Board provided applicant A with a copy of the notes the investigator took during her interview with applicant A, but withheld all the other interview notes in their entirety under ss. 19 (harm to individual or public safety) and s. 22 (unreasonable invasion of third party personal privacy).

[11] Applicant A requested that the OIPC review the School Board's decision to withhold the interview notes under ss. 19 and/or 22. Mediation failed and the matter proceeded to an inquiry (inquiry A). The School Board's inquiry A submissions included extensive evidence from witnesses who say they experienced or saw applicant A engage in bullying and harassing behaviour and fear that she will retaliate against them if the School Board discloses the interview notes to her.

The respondent's access requests

[12] The day after the School Board filed its initial submission in inquiry A, the respondent made the first access request (request 1) at issue here, which asks for a:

> Complete, un-redacted copy of the notes [the investigator] took in the course of conducting the 2016/17 investigation into allegations regarding bullying and harassment at the Vancouver Board of Education, including the notes – in their entirety – from all witnesses.

[13] A few hours after the School Board made its reply submissions in inquiry A, the respondent made three additional successive access requests (requests 2-4). Without repeating them verbatim, the respondent requested the following types of records in requests 2-4:

- Certain records originating at the School Board's Freedom of Information Office prepared for the School Board Superintendent or the School Board during a specific time period.
- All browser histories for School Board employees involved in any stage of processing freedom of information requests from the time between request 1 and requests 2-4.

[5] Section 23 specifies when and how a public body may or must give notice to third parties when the public body believes a requested record contains the third party's personal information and s. 22 may or does apply.

- All emails between certain School Board employees that reference any part of the respondent's name sent in the time period between request 1 and requests 2-4.
- All emails sent by a specific School Board employee to the School Board's legal counsel in the time period between request 1 and requests 2-4 that reference any part of the respondent's name, or the investigator's last name.
- All records detailing any consultation undertaken by any School Board staff, contractor, or legal counsel with "affected third parties" regarding request 1.

Relationship between the respondent and applicant A

[14] The parties agree that the respondent and applicant A know one another and have worked together previously.[6] The agreed upon evidence before me establishes that the respondent and applicant A were both closely affiliated with a particular political party (the party). For example, applicant A ran as a candidate for, was elected as, and represented the party when she worked as a School Board trustee. During five years of that time, the respondent worked as the executive director of the party, including at the time of the investigation. During the investigation, the respondent supported the trustees who had been elected as candidates of the party. Additionally, the respondent signed applicant A's trustee nomination papers for the party in one election and sought a nomination with the party along with applicant A in a different election.

[15] The parties also agree that the respondent and applicant A have discussed inquiry A.[7] For example, the respondent says that applicant A consulted with him about her access requests to the School Board and he consistently advised her to pursue those requests.[8] He also says applicant A consulted with him about the arguments the School Board made in inquiry A for not releasing the interview notes to her. In addition, the respondent indicates that he knows the public body consulted with third parties about request A.[9]

[16] With these background facts in mind, I will now describe the legal principles for s. 43 applications.

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[6] The information summarized in this paragraph comes from the Respondent's Affidavit at paras. 4-5; the Respondent's submission at pp. 3-4; and the Director's Affidavit at paras. 8-9 and 24.
[7] School Board's initial submission at para. 36; Respondent's Affidavit at paras. 4-5; School Board's reply submission at paras. 9-12.
[8] The information summarized in the remainder of this paragraph comes from the Respondent's Affidavit at paras. 4-5.
[9] Respondent's submission at p. 6. Specifically, the respondent says he knows the School Board consulted with third parties for an "identical request" to one of his requests. This is undoubtedly a reference to request A.

Legal principles – frivolous or vexatious requests under s. 43(b)

[17] Former Commissioner Loukidelis has said that s. 43 applications require careful consideration because granting a public body relief under s. 43 necessarily curtails or eliminates the statutory access rights of individuals.[10] Similarly, former Commissioner Flaherty cautioned that "[g]ranting section 43 requests should be the exception to the rule and not a routine option for public bodies to avoid their obligations under the legislation."[11]

[18] While s. 43 applications should be approached carefully, the British Columbia Supreme Court has described s. 43 as "an important remedial tool in the Commissioner's armory to curb abuse of the right of access."[12] Abuse of access rights detrimentally impacts the rights of others and harms the public interest. Accordingly, applicants should always exercise their access rights in good faith and must not abuse them. As stated by former Commissioner Loukidelis:

> … Access to information legislation confers on individuals such as the respondent a significant statutory right, i.e., the right of access to information (including one's own personal information). All rights come with responsibilities. The right of access should only be used in good faith. It must not be abused. By overburdening a public body, misuse by one person of the right of access can threaten or diminish a legitimate exercise of that same right by others, including as regards their own personal information. Such abuse also harms the public interest, since it unnecessarily adds to public bodies' costs of complying with the Act. Section 43 exists, of course, to guard against abuse of the right of access.[13]

[19] A frivolous or vexatious request is an abuse of the access rights conferred by FIPPA.[14] Frivolous requests include trivial requests and requests made primarily for a purpose other than gaining access to information. Vexatious requests include requests made in bad faith, such as those made for a malicious purpose or to harass or obstruct a public body. To fit within the meaning of vexatious under s. 43(b), a request must be more than merely annoying, irksome or distressing.[15] The legislative purposes of FIPPA should not be frustrated by a

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[10] Auth. (s. 43) 99-01, (December 22, 1999) at p. 3. Available on the OIPC website at https://www.oipc.bc.ca/decisions/170.
[11] Auth. (s. 43), (October 31, 1996) at para. 3. Available on the OIPC website at https://www.oipc.bc.ca/decisions/162.
[12] *Crocker v. British Columbia (Information and Privacy Commissioner)*, 1997 CanLII 4406 (BC SC) at para. 33.
[13] Auth. (s. 43) 99-01, (December 22, 1999) at pp. 7-8. Available on the OIPC website at https://www.oipc.bc.ca/decisions/170.
[14] Auth (s. 43) 02-02, (November 8, 2002) at para. 27. Available on the OIPC website at https://www.oipc.bc.ca/decisions/172. The information summarized in the remainder of this paragraph comes from para. 27 of this decision unless otherwise specified.
[15] Order F13-18, 2013 BCIPC 25 at para. 35.

public body's subjective view of the annoyance quotient of any given access request.

Parties' positions

[20] The School Board asserts that the respondent has abused his access rights by colluding with applicant A to make frivolous and vexatious requests within the meaning of s. 43(b).[16] The School Board argues that request 1 represents an inappropriate attempt to circumvent the proceedings in inquiry A and to "send a clear message" to the School Board and the witnesses that "whether through her own request, or that of her surrogate [i.e. the respondent], one way or another [applicant A] was going to get the records."[17] The School Board also suggests that the "striking similarity" in the language of request 1 and request A was an intentional choice, meant to exacerbate the fears witnesses expressed about applicant A in sworn evidence the School Board submitted in inquiry A the day before the respondent made request 1. When it comes to requests 2-4, the School Board submits these constitute retaliatory conduct directed by applicant A using the respondent as a surrogate to bully, harass and intimidate School Board staff.

[21] To support its argument, the School Board draws my attention to the following:[18]

- The relationship between the respondent and applicant A.
- The timing of request 1 in relation to inquiry A, particularly in light of the fact that:
    - The investigation occurred more than three years ago; and
    - In all that time, the School Board never received any requests for the interview notes other than request A and request 1.
- The similarity in language between request A and request 1.
- The timing and content of requests 2-4 in relation to inquiry A.

[22] The respondent says that no one instructed or asked him to file his requests.[19] He says that he acted completely of his own accord. He claims that he did not file the requests for the purpose of sharing them with anyone else and says he has no intention of doing so.

[23] In discussing his motivation for making request 1, the respondent explains:

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[16] The information in this paragraph comes from the School Board's initial submission at paras. 3-4, 29-30, 46, 48 and 58-59.
[17] *Ibid* at para. 29.
[18] *Ibid* at paras. 19, 21 and 23-24; and Director's Affidavit at para. 25.
[19] The information summarized in this paragraph and the one that follows comes from the Respondent's Affidavit at paras. 3, 5, 7 and 9; and the Respondent's submission at p. 4.

- After applicant A consulted him about the School Board's arguments for not releasing the interview notes to her in inquiry A, he decided to make request 1 because he believes the School Board's arguments were based on *who* was asking for the records, instead of whether the requested records could be released into the public domain.
- He believes the School Board's efforts to deny applicant A access to the interview notes means they might contain political information of interest.
- He has an interest in public education matters and believes the public has a right to know what happened in a highly contentious and political dispute.
- He is conducting research into key events that shaped the school district because he is considering running as a candidate for the next School Board election.
- He was actively involved in supporting the party's trustees at the time of the investigation, so he wants to know what led to the investigation's findings.

[24] When it comes to requests 2-4, the respondent says he made these because he has concerns that the School Board violated his privacy.[20] After he made request 1, he says he noticed that several people viewed his LinkedIn profile, including School Board employees, legal counsel, and people the respondent thinks were probably witnesses. This made the respondent wonder if the School Board had disclosed his name and information about request 1 to third parties. He says he decided to file requests 2-4 so that he could establish the validity of his concerns. The respondent says he wrote the OIPC in April flagging this possible privacy violation. He contends that the School Board's efforts to disregard requests 2-4 "is evidence it may have something to hide, namely that it has disclosed my name to third parties."[21]

[25] In reply, the School Board submits that I should place no weight on some of the respondent's assertions because they are not credible.[22] For instance, the School Board argues that the respondent's claim that he does not intend to share his requests with anyone is not credible when one considers the relationship between the respondent and applicant A and the fact that the respondent admits to consulting applicant A about request A and inquiry A. The School Board also notes the inconsistency between: *(a)* the respondent's claim that he does not intend to share his requests with anyone; and *(b)* his claim that he believes the public "has a right to know" what happened. The School Board further contends that if the respondent did genuinely believe that the interview notes relate to a matter of public interest, then he would have made his access request three

[20] The information summarized in this paragraph comes from the Respondent's submission at pp. 5, 6-8; and the Respondent's Affidavit at para. 8.
[21] Respondent's submission at p. 8.
[22] The information summarized in this paragraph and the one that follows comes from the School Board's reply submission at paras. 4, 9-10, 12-13, 19, 26-27 and 31.

years ago instead of waiting to make request 1 until the day after the School Board filed its submissions in inquiry A.

[26] According to the School Board, the evidence supports a finding that the respondent and applicant A acted in concert to defeat the purposes of FIPPA, including the School Board's application of s. 19 to the interview notes. In particular, the School Board draws my attention to the respondent's admission that the School Board's arguments in inquiry A motivated him to file request 1. This, the School Board submits, "constitutes a clear admission that the Respondent was motivated by a vexatious or improper purpose, that is to seek disclosure of the responsive records by avoiding arguments raised by" the School Board in inquiry A.[23]

Analysis and findings

[27] For the reasons that follow, I do not find any of the respondent's four requests frivolous or vexatious. As such, I have not authorized the School Board to disregard them. I will begin with a discussion of request 1 and then turn to requests 2-4.

Request 1

[28] As I understand it, the School Board argues that the respondent made request 1 to: *(a)* assist applicant A to circumvent the adjudicative process in inquiry A; and/or *(b)* continue applicant A's ongoing pattern of intimidation and harassment.[24] While the School Board has presented extensive arguments, I am not satisfied on balance that these were the motivations for request 1. Instead, I find it more likely than not that the respondent genuinely wants access to the interview notes for the reasons he identifies in his submissions – namely, because of his interest in the events that took place in the investigation as someone who worked with and defended some of the trustees, his interest in potentially running as a candidate in the next School Board election, and his belief that the School Board's decision to refuse access to applicant A means the records may contain political information of interest.

[29] Because of the connection between this s. 43 application and inquiry A, the School Board provided copies of its inquiry A submissions for my review. As noted above, the respondent made request 1 the day after the School Board filed its initial submission in inquiry A. In that submission, the School Board provided detailed arguments about why it withheld the interview notes from applicant A under ss. 19(1)(a) and 22. The School Board hinged many of its arguments about why these two FIPPA exceptions apply on the identity of applicant A.

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[23] *Ibid* at para. 10.
[24] School Board's reply submission at para. 33.

[30] The School Board's initial submission in inquiry A also indicates that when it consulted with the witnesses prior to deciding how to respond to request A, many witnesses strenuously objected to the disclosure of the interview notes to applicant A in particular.[25] The School Board noted that there was "a sudden resurgence of anxiety at the School District… about even the possibility that some information might be disclosed that would allow [applicant A] to identify" the witnesses.[26]

[31] The undisputed evidence before me establishes that the respondent knew the School Board's arguments for withholding the interview notes in inquiry A. This, he says, is part of what motivated him to make request 1. In his words:

> When the other applicant [applicant A] consulted me regarding the [School Board]'s arguments for not releasing the documents to her, I decided – on my own – to submit my request, as I believe the [School Board]'s arguments were based on *who* was asking for the records, instead of whether the requested records could be released into the public domain.[27]

[32] The respondent also makes clear that he was fully aware that the School Board consulted with third party witnesses after receiving request A. He complained to the OIPC about the School Board taking a time extension to consult with affected third parties before responding to his access request.[28] He said that it "could not be true" that the School Board needed more time to consult with third parties because he "was aware parties have already been consulted… for the identical request made by another applicant."[29]

[33] In short, I find the respondent knew an extensive amount of information about request A – including that it was, in his words, "identical" to his and that third parties had been consulted about it. Additionally, in saying he knew the School Board's arguments were based on *who* was asking for the records, I find that the respondent was aware of the harms multiple witnesses alleged experiencing or fearing in relation to applicant A. Knowing this, he decided to make an "identical" request. I have spent quite some time thinking about the respondent's choice to make request 1 in these circumstances. The School Board has described it as "particularly troubling"[30] and I can see why. The choice to make request 1 knowing that multiple witnesses have alleged that disclosure of the interview notes would have a negative personal impact on them suggests a careless disregard for the witnesses' testimony and concerns. However, I am

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[25] Manager's Affidavit #2 submitted in inquiry A at para. 38
[26] School Board's initial submission in inquiry A at para. 16.
[27] Respondent's Affidavit at para. 5.
[28] Under s. 10(1)(c), a public body can extend the time for responding to a request for up to 30 days if it needs more time to consult with a third party or other public body before it can decide whether or not to give an applicant access to a requested record.
[29] Respondent's submission at p. 6.
[30] School Board's initial submission at para. 30.

not satisfied that this rises to the level of maliciousness or harassment captured by s. 43(b) or that it demonstrates that the respondent is attempting to bully or harass School Board staff as a surrogate for applicant A.

[34] As previous orders have said, s. 43 is a blunt tool that authorizes public bodies to disregard access requests, effectively curtailing or denying an individual's statutory rights under FIPPA.[31] Consequently, past orders have tended not to apply s. 43(b) when a respondent is making a request for the first time and genuinely wants access to the requested information.[32] Despite the School Board's suspicions about the respondent's motives and its speculation that he has colluded with applicant A in making request 1, I am satisfied that he genuinely wants access to the requested information.[33] The respondent has explained:

> Contrary to the elaborate scheme of "collusion" suggested by the public body, my motivations for seeking the information in [request 1] is simple. I believe the public body's efforts to deny the other applicant access to the records indicates they may contain political information of interest. As I was actively involved in supporting the [party] school board caucus throughout the period preceding the investigation and throughout it, I have an interest in learning what happened during the investigation that led to its findings.
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> Additionally, I am considering standing as a candidate for the Vancouver School Board in the next election. Having paid close attention and worked with former trustees, I am conducting research into various key events that shaped the school district to inform my own decision making around the potential run for office. The events around the [investigation] Report are perhaps some of the most pivotal moments in the district's recent memory. As a potential candidate for the board, I wish to have a better sense of what took place during that period…[34]

[35] The School Board questions the credibility of these aspects of the respondent's evidence in part because of the passage of time between the investigation and request 1. However, the fact that the interview notes and incidents discussed in them occurred some years ago does not suffice to render the respondent's interest in them frivolous or vexatious, particularly given his stated intention to potentially run as a candidate in the next School Board election.[35] I have no reason to doubt the veracity of this intention given the uncontested evidence before me respecting the respondent's professional background. For example, I note that the respondent attempted to secure a

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[31] Order F14-13, 2014 BCIPC 16 at para. 22.
[32] *Ibid.*
[33] For similar reasoning, see Order F18-34, 2018 BCIPC 37 at para. 22.
[34] Respondent's submission at p. 4.
[35] For similar reasoning, see Decision F08-03, 2008 CanLII 13326 (BC IPC) at para. 38.

nomination in a previous School Board election and served as an elected trustee in a different school district for two terms.[36]

[36] The School Board also argues that applicant A and the respondent have coordinated their efforts to enable applicant A to circumvent the inquiry A process. The respondent denies working in coordination with applicant A. I find it abundantly clear based on the undisputed evidence in this case that applicant A and the respondent know one another and have discussed request A and inquiry A together extensively. In these factual circumstances, I find it equally clear that the two applicants may have indeed coordinated their efforts to some degree when it comes to request 1. In my view, however, this factual matrix does not support a finding that request 1 was made to circumvent the inquiry A process because any such attempt would undoubtedly fail. Inquiry A has concluded and the fact that the respondent has made his own access request cannot circumvent inquiry A, in the sense of stopping it from being adjudicated and decided on its merits. Further, the obvious relationship between the respondent and applicant A and the clear connection between request A and request 1 leads me to conclude that any findings in inquiry A about the application of ss. 19 and 22 to the investigator's notes would also apply in relation to request 1. I also note that the School Board implies that it will take the same position in responding to request 1 that it took when responding to request A – i.e. withholding the interview notes under ss. 19 and 22.[37] In the circumstances, I find it unlikely that the respondent believed he could circumvent the inquiry A process by making request 1.

[37] To summarize, after careful consideration, I have concluded that the respondent has a genuine interest in accessing the request 1 records. The fact that the respondent has discussed the matters underlying his request with another access applicant and knows extensive information about an "identical" access request does not mean that request 1 is harassing or malicious in the sense required by s. 43(b). I recognize that the School Board has found request 1 troubling and, as described above, I can understand why. Be that as it may, the respondent has a statutory right to utilize FIPPA in an attempt to obtain records – a right uncompromised by the fact that his request may cause some difficulties for the School Board.[38]

[38] I will now turn to requests 2-4.

Requests 2-4

[39] As described above, the School Board argues that requests 2-4 represent a perpetuation of applicant A's ongoing pattern of bullying and intimidation. Specifically, the School Board claims that these three requests "are yet another

[36] Respondent's submission at p. 3.
[37] School Board's reply submission at para. 38.
[38] Decision F08-03, 2008 CanLII 13326 (BC IPC) at para. 39.

example of retaliatory conduct directed by [applicant A], through [the respondent], at members of the [School Board] staff."[39]

[40] I do not accept this argument because it requires me to find that applicant A directed the respondent's actions. Nothing in the requests themselves or the surrounding circumstances supports the suggestion that applicant A instructed or encouraged the respondent to file requests 2-4 in order to bully or intimidate School Board staff. I recognize that the respondent made these requests a few hours after the School Board filed its inquiry A reply submission. However, this does not suggest to me that applicant A instigated requests 2-4. She certainly may have told the respondent about the School Board's reply submission but, without more, this does not support a finding that the respondent filed requests 2-4 on behalf of applicant A to bully or intimidate School Board staff.

[41] Instead, I find it more likely that the respondent filed these requests for the reason he identifies in his submission: to figure out whether the School Board told third parties his name and information about request 1. In my view, the content of requests 2-4 supports the respondent's stated motive because he primarily asked for information specifically about himself or his first request. For example, he asked for emails that reference any part of his name sent between request 1 and requests 2-4 and asked for information related to third party consultations performed in relation to request 1.

[42] Previous orders have found that where a respondent has a live issue or grievance with a public body and a genuine need for, or interest in, the requested records, the requests were not frivolous or vexatious.[40] In this case, the respondent says he made requests 2-4 because of his suspicion that the School Board may have violated his privacy rights by sharing his name with third parties.[41] He says he began to have this suspicion when he noticed that School Board staff, legal counsel and certain third parties he believes were witnesses viewed his LinkedIn profile. By making requests 2-4, the respondent says he is seeking information to help establish the validity of his concern that the School Board violated his privacy.[42] I accept these aspects of the respondent's evidence because of the content of the requests as set out above. Taking all this into account, I am not satisfied that requests 2-4 are frivolous or vexatious under s. 43(b).

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[39] Director's Affidavit at para. 33.
[40] Order F19-08, 2019 BCIPC 10 at para. 15 citing Decision F07-08, 2007 CanLII 42406 (BC IPC) and Order F18-32, 2018 BCIPC 35.
[41] Respondent's Affidavit at para. 8.
[42] Respondent's submission at p. 5.

CONCLUSION

[43] I recognize that the School Board has found the respondent's access requests troubling and believes he made them in bad faith. I also understand that the School Board may find it upsetting to process the respondent's requests. However, in my view, the School Board has not demonstrated that the respondent's requests are frivolous or vexatious to the extent that I should curtail his right of access, including to his own personal information.

[44] Taking all this into account, I find that the respondent's four outstanding requests are neither frivolous nor vexatious for the purposes of s. 43(b). The School Board must process them and give the respondent a response in compliance with Part 2 of FIPPA.

July 31, 2020

ORIGINAL SIGNED BY

Laylí Antinuk, Adjudicator

OIPC File No.: F20-82533