Order F24-65

WORKERS' COMPENSATION BOARD

David S. Adams
Adjudicator

July 16, 2024

CanLII Cite: 2024 BCIPC 75
Quicklaw Cite: [2024] B.C.I.P.C.D. No. 75

Summary: An access applicant (the respondent) made a request, under the *Freedom of Information and Protection of Privacy Act* (FIPPA) for records containing information about himself. The Workers' Compensation Board (WorkSafe) requested authorization from the Office of the Information and Privacy Commissioner under s. 43 of FIPPA to disregard the request on the basis that it was frivolous and vexatious, and that responding to it would unreasonably interfere with WorkSafe's operations because it was repetitious and systematic. The adjudicator found that the access request was vexatious and authorized WorkSafe to disregard it. The adjudicator also found that future access requests were likely to be vexatious and granted some future relief.

Statutes Considered: *Freedom of Information and Protection of Privacy Act*, RSBC 1996 c 165, ss. 43(a), 43(c)(ii).

INTRODUCTION

[1] On January 10, 2024, an access applicant (the respondent) requested certain records relating to reports about him (the Request) from the Workers' Compensation Board (WorkSafe). The respondent has made several access and correction requests under the *Freedom of Information and Protection of Privacy Act* (FIPPA) to WorkSafe over the past 10 years. WorkSafe has responded to all but one of these requests.

[2] WorkSafe applied to the Office of the Information and Privacy Commissioner (OIPC) for authorization to disregard the Request, under ss. 43(a) (frivolous or vexatious) and (c) (unreasonable interference with the public body's operations) of (FIPPA).[1] It says that the Request, when viewed in context with the

[1] The Legislature amended the wording of s. 43 in November 2021: *Freedom of Information and Protection of Privacy Amendment Act*, SBC 2021, c 39 s 27. The Legislature added the words "including because" to the opening words of s. 43, changed the order of the subsections, and

respondent's previous requests, shows that the respondent is using FIPPA for the improper purposes of criticizing WorkSafe, pressuring WorkSafe staff into changing decisions, and harassing WorkSafe staff, rather than for the purpose of genuinely requesting information that he does not already have.[2] The respondent says that WorkSafe has not proven any of the elements required for relief under s. 43.[3]

[3] WorkSafe is also requesting future relief: it seeks to disregard any access or correction requests from the respondent for the next three years. In the alternative, it asks that I order that the respondent may not make any access requests for records which WorkSafe has already provided to him, and that I restrict him to one open access or correction request per year.[4]

[4] Both parties provided extensive submissions for this application.

Preliminary Matters

Conflict of interest and bias

[5] The respondent alleges that the fairness of this application, and the OIPC's process generally, could be compromised because WorkSafe's lawyer on this application works for a law firm that has a "long, ongoing association with the OIPC". He says that the OIPC's registrar has made decisions against him, or failed to make decisions, on his requests to be heard on this issue, with the result that the issue may not be heard and substantive unfairness will result.[5] In reply, WorkSafe denies any conflict of interest.[6]

[6] Previous orders have emphasized that a decision maker needs to approach a case with an open mind.[7] The respondent raises the question of a reasonable apprehension of bias in the processing of this application and in the OIPC's procedures generally. The Supreme Court of Canada has articulated the test for a reasonable apprehension of bias in these terms:

> …what would an informed person, viewing the matter realistically and practically – and having thought the matter through – conclude[?] Would he think that it is

added a new subsection, s. 43(b). WorkSafe follows the numbering scheme of the pre-November 2021 version of FIPPA in its submission; in this order I have used the numbering of the current version.

[2] WorkSafe's initial submission at para 6.
[3] Respondent's submission at para 209.
[4] WorkSafe's initial submission at paras 98-99.
[5] Respondent's submission at paras 25-30.
[6] WorkSafe's reply submission at para 10.
[7] See, e.g., Order F4-24, 2024 BCIPC 31 (CanLII) at para 16.

> more likely than not that [the decision-maker], whether consciously or unconsciously, would not decide fairly[?][8]

[7] In addition, lawyers have their own professional obligation to avoid conflicts of interest.[9]

[8] Nothing in the respondent's submissions persuades me that there is a reasonable apprehension of bias in this case. I do not think an informed person, viewing the matter realistically and practically, would conclude that the respondent would not get a fair hearing from the OIPC because one lawyer at a large global law firm represents WorkSafe on this application, while other lawyers from the same firm may have given advice to the OIPC or represented it at various unspecified times. I do not think the respondent has taken his concerns out of the realm of speculation and into the realm of reasonable apprehension.

Respondent's OIPC complaints

[9] The respondent says that in 2023, he complained to the OIPC about some of WorkSafe's contraventions of FIPPA, and that the OIPC has failed to properly handle those complaints. I understand him to be saying that WorkSafe and the OIPC are working together to undermine his complaints.[10]

[10] This application is completely separate from any complaints the respondent may have before the OIPC. In deciding this application, I have considered only the materials provided by the parties. Furthermore, no order I make will affect the OIPC's processing of the respondent's complaints.

ISSUES AND BURDEN OF PROOF

[11] The issues I must decide in this application are as follows:

1. Is the Request frivolous or vexatious under s. 43(a)?

---

[8] *Yukon Francophone School Board, Education Area #23 v. Yukon (Attorney General)*, 2015 SCC 25 at para 20, citing *Committee for Justice and Liberty v. National Energy Board*, 1976 CanLII 2 (SCC), [1978] 1 SCR 369 at 394.

[9] See, e.g., *R v. Louie*, 2015 BCCA 23 at para 16.

[10] Respondent's submission at paras 82-90; the respondent refers to the doctrine of collateral attack, which operates to prevent "a party, bound by an order, seeking to avoid the effect of that order by challenging its validity in the wrong forum": *Garland v. Consumers' Gas Co.*, 2004 SCC 25 at para 72, citing *R. v. Litchfield*, 1993 CanLII 44 (SCC), [1993] 4 SCR 333 at 349. The applicant has not identified any order or decision whose consequences WorkSafe is trying to avoid by making this s. 43 application, so I find that the doctrine of collateral attack does not apply.

2. Would responding to the Request unreasonably interfere with WorkSafe's operations because the Request is repetitious or systematic, under s. 43(c)?

3. What relief, if any, is appropriate?

[12] Previous OIPC orders have established that the applicant public body has the burden of proof in a s. 43 application.[11]

DISCUSSION

Background[12]

[13] WorkSafe is a statutory body created under the *Workers Compensation Act*[13] to oversee a no-fault insurance system for workplace injuries in BC. WorkSafe is listed as a public body in Schedule 2 of FIPPA.

[14] The respondent is an injured worker who has an active claim with WorkSafe. The parties have frequently corresponded about the respondent's claim. This correspondence is voluminous and has often been contentious. The respondent has also made access requests and complaints under FIPPA relating to his claim. In total, the respondent has made 37 access requests (under s. 5 of FIPPA) and four requests for correction (under s. 29 of FIPPA) over the past 10 years. The responses to some of these requests have been reviewed by the OIPC.

[15] In March 2023, in response to a letter from the respondent, WorkSafe imposed a set of contact restrictions on him. The parties exchanged a great number of communications about these restrictions. In October 2023, WorkSafe rescinded the contact restrictions.

[16] In September 2023, WorkSafe announced its intention to apply to the OIPC under s. 43 for relief from the respondent's access requests. I will refer to this as the "contemplated s. 43 application". In October 2023, WorkSafe gave notice that it would not pursue the contemplated s. 43 application.

[17] In January 2024, the respondent made two access requests: one on January 9, to which WorkSafe has already responded, and one on January 10, which is the Request. The Request is for records related to the imposition of the contact restrictions. In February 2024, WorkSafe applied for relief from the

---

[11] See, e.g., Order F20-39, 2020 BCIPC 46 (CanLII) at para 8; Order F17-18, 2017 BCIPC 19 (CanLII) at para 4.
[12] The information in this section is drawn from the parties' submissions and evidence.
[13] RSBC 2019 c 1.

Request, and future requests, under s. 43, and it is this application that I must now decide.

Application to disregard an access request– s. 43

[18] Section 43 gives the OIPC the discretionary power to authorize public bodies to disregard certain access requests.[14] The parts of s. 43 that WorkSafe relies on in its application say as follows:

> **43** If the head of a public body asks, the commissioner may authorize the public body to disregard a request under section 5 [access requests] or 29 [correction requests], including because
>
> (a) the request is frivolous or vexatious;
>
> …
>
> (c) responding to the request would unreasonably interfere with the operations of the public body because the request
>
> …
>
> (ii) is repetitious or systematic.

[19] Section 43 is remedial rather than punitive in nature. Its purpose is to curb abuses of the access rights conferred by FIPPA.[15] The BC Supreme Court has rejected the suggestion that there is a "high onus cast" on a public body invoking it, and have held instead that s. 43 "must be given the 'remedial and fair, large and liberal construction and interpretation as best ensures the attainment of its objects', that is required by s. 8 of the *Interpretation Act*".[16]

[20] In considering whether to grant relief to a public body under s. 43, I must exercise my discretion carefully, since relief granted under that section entails a restriction on the rights of access granted by the Legislature under FIPPA.[17]

The Request

[21] The Request is for records related to internal reports about the respondent's behaviour that formed the basis of the contact restrictions, and on which the respondent evidently believed WorkSafe had sought to rely in the contemplated s. 43 application.

---

[14] See, e.g., Order F19-34, 2019 BCIPC 37 (CanLII) at para 14.
[15] *Crocker v. British Columbia (Information and Privacy Commissioner)*, 1997 CanLII 4406 (BC SC) [*Crocker*] at paras 32-33; Order F24-02, 2024 BCIPC 2 (CanLII) at para 14.
[16] *Crocker*, *ibid* at para 32; *Interpretation Act*, RSBC 1996 c 238.
[17] Decision-Auth (s43) 99-01 (December 22, 1999) at 3. Available on the OIPC website at https://www.oipc.bc.ca/documents/decisions/158.

[22] The Request reads, in part:

> I request:
>
> > 1. The disclosure of all such reports, as they obviously concern me and obviously contain personal information that WorkSafeBC has used to attempt to affect my rights – particularly my rights as they relate to FIPPA, having attempted to extinguish them entirely.
> >
> > 2. The disclosure of all disposition reports of those to whom the initial reports were made. Such reports will likely demonstrate how the receiver of the initial reports addressed them, once they were made.
> >
> > 3. The disclosure of all further documentation (further reporting and further disposition) that might have been generated if such reports were escalated further, beyond the initial receiver of such reports.

Frivolous or vexatious – s. 43(a)

[23] Section 43 allows me to authorize WorkSafe to disregard a request that is frivolous or vexatious. Frivolous or vexatious requests are those made for a purpose other than a genuine desire to access information.[18] WorkSafe says that the Request is frivolous and vexatious in nature.[19]

Vexatious

[24] Vexatious requests include those made in bad faith or for a malicious purpose, or for the purpose of harassing or obstructing the public body.[20] Previous orders have found requests to be vexatious where:

- The purpose of the request was to pressure the public body into changing a decision or taking an action;
- The respondent was motivated by a desire to harass the public body;
- The intent of the requests was to express displeasure with the public body or to criticize the public body's actions; and
- The request was intended to be punitive and to cause hardship to an employee of the public body.[21]

[25] Evidence of ill will between the parties is not enough, on its own, to support a finding that an access request is vexatious.[22]

---

[18] Order F22-08, 2022 BCIPC 8 (CanLII) at para 81.
[19] WorkSafe's initial submission at para 72.
[20] Order F22-08, *supra* note 18 at para 83.
[21] *Ibid* and the orders and decisions cited therein.
[22] Order F21-34, 2021 BCIPC 412 (CanLII) at para 56.

[26] WorkSafe says that the Request is vexatious because, when viewed in combination with the respondent's other access requests, it is a misuse of the respondent's FIPPA rights, and was made for oblique motives and/or to harass WorkSafe staff.[23] It says that the respondent has created unnecessary work for WorkSafe by sending correspondence related to his access requests to "numerous staff…by numerous means".[24]

[27] WorkSafe says that the respondent's correspondence "has often been very lengthy and, in some circumstances, abusive towards WorkSafeBC staff".[25] WorkSafe relies on an affidavit from its senior manager for access to information and privacy (the Privacy Manager), who deposes that when WorkSafe receives a communication from the respondent, "it is very difficult for WorkSafeBC staff to identify the issue(s) that [the respondent] is seeking to address in his communications, to determine what may or may not be properly addressed under FIPPA".[26]

[28] The respondent says he made the Request in good faith and for a proper purpose – namely, the desire to see information about him that was to have been used in the contemplated s. 43 application, and was used to impose contact restrictions on him.[27]

[29] I can see that the respondent has, from April 2023 to the time of this application, made six access requests (including the Request) relating to the imposition of the contact restrictions.[28] I will briefly summarize them here. The April 11, 2023 request is for "the totality of the information" on which WorkSafe decided to impose the contact restrictions, and also for policies that guided that decision. The April 18, 2023 request is for any and all "threat reports" or "risk assessments" generated by WorkSafe about himself. The May 1, 2023 request is for records showing when WorkSafe received his April 11 and April 18, 2023 requests and a letter he sent following up on those requests. The May 30, 2023 request reiterates what he asked for in his May 1, 2023 request and also includes a request for any "commentary" on that request by a named WorkSafe staff member. The January 9, 2024 request is again for policies that guided WorkSafe's contact restrictions decision. In that request, the respondent expresses his dissatisfaction with the response to his April 11, 2023 request, saying that it is "not valid". Finally, the Request is for all reports about the respondent's behaviour and for records related to the handling of those reports.

[23] WorkSafe's initial submission at paras 74-81.
[24] *Ibid* at para 85.
[25] WorkSafe's initial submission at para 2.
[26] Affidavit of Privacy Manager at para 15.
[27] Respondent's submission at paras 190-195.
[28] Affidavit of Privacy Manager, Exhibits A, UU, VV, and ZZZ.

[30] WorkSafe responded to the five requests that preceded the Request. If the respondent was unsatisfied with the substance of these responses, he had the option of requesting a review from the OIPC. However, on the evidence before me, it does not appear that he did so. Instead, he continued to make further follow-up access requests.

[31] In my view, the Request continues a well-established pattern in which the respondent will make an access request, receive a response, and then make multiple follow-up requests in order to take issue with the response he has received and otherwise continue the underlying dispute. On this basis, I find that the Request is concerned with criticizing WorkSafe, making accusations of impropriety, expressing displeasure, and continuing existing disputes rather than with a good faith desire to access information, and is therefore vexatious.

Conclusion: frivolous or vexatious

[32] To conclude, for the reasons given above, I find that the Request is vexatious under s. 43(a). I do not need to consider, therefore, whether it is also frivolous. Since this finding is a sufficient ground to allow WorkSafe to disregard the Request, I also do not need to consider whether responding to it would unreasonably interfere with WorkSafe's operations because it is repetitious or systematic, under s. 43(c).

What, if any, is the appropriate remedy?

[33] I have found that the Request is vexatious under s. 43(a). I therefore authorize WorkSafe to disregard it.

[34] WorkSafe also asks that I authorize it to disregard any future access or correction requests from the respondent for the next three years. In the alternative, it asks me to order that the respondent may not make any requests for records which WorkSafe has previously provided to him, and that he may not make more than one access or correction request per year.[29] It supports this request by saying that the respondent has, in the past, made repetitious, systematic, frivolous, and vexatious requests, and that there is "no reasonable purpose" for future access requests.[30] The Privacy Manager deposes that the respondent's requests have consumed "a very significant number of hours of WorkSafeBC staff time and resources, and that the time spent on the respondent's requests "far exceeds the time required to manage communications from other requestors".[31]

[29] WorkSafe's initial submission at paras 97-100.
[30] *Ibid* at paras 95 and 101-102.
[31] Affidavit of Privacy Manager at paras 33-35.

[35] The respondent submits that no future relief is available under s. 43. He says that the wording of the statute is focused on the particular request in issue, and that the maximum relief that could be granted is authorization to disregard the Request.[32]

[36] However, what the respondent says about that does not take into account that the BC Supreme Court has interpreted s. 43 as allowing the Commissioner the jurisdiction to grant future relief. It has said that "Section 43 would be rendered useless if a public body, which is being unduly burdened by a number of repetitious or systemic requests, had to make separate applications to the Commissioner every time it received a new request from that person".[33]

[37] I find that future relief is warranted in this case. Previous orders have taken the following factors into account when tailoring remedies under s. 43:

- A respondent's right to her own personal information;
- Whether there are live issues between the public body and the respondent;
- Whether there will likely be any new responsive records in the future;
- The respondent's stated intentions;
- The nature of past requests; and
- Other available avenues for obtaining information in the past and the future.[34]

[38] Future relief, if granted, must not be wholly disproportionate to the harm inflicted on the public body.[35]

[39] WorkSafe provided evidence of the respondent's past access requests over the last 10 years. Based on that evidence, I find that the respondent has, over this period, demonstrated a consistent pattern of making access and correction requests that are really aimed at making accusations and criticizing the conduct of WorkSafe staff and service providers. For example, in his May 18, 2017 correction request, the respondent accuses a service provider of "egregious recklessness with the truth" and a WorkSafe staff member of "commit[ting] these lies to file".[36] The majority of the respondent's September 24, 2017 access request is devoted to accusations against a WorkSafe staff member.[37] The respondent's March 18, 2019 access request appears to be an attempt to challenge the opinion of a service provider.[38] Much of the respondent's October 26, 2020 access request is devoted to an attack on a service provider, accusing

[32] Respondent's submission at paras 206-207.
[33] *Crocker*, *supra* note 15 at paras 40-41.
[34] Order F20-39, *supra* note 11 at para 43, citing Decision F06-03, 2006 CanLII 13535 (BC IPC) at para 69.
[35] *Crocker*, *supra* note 15 at para 45.
[36] Affidavit of Privacy Manager, Exhibit K.
[37] *Ibid*, Exhibit P.
[38] *Ibid*, Exhibit W.

the service provider of corruption and of being "a blight on his profession, who profits from deceitfully undermining the work of his professional colleagues, behind their backs, in exchange for cash from [WorkSafe]".[39] Much of the respondent's March 16, 2021 access request is devoted to criticizing various WorkSafe practices.[40] The respondent's January 28, 2023 correction request describes "circumstances that [WorkSafe] has certainly shaped through the misfeasance of particular [WorkSafe] officers and their pet experts, who seem to be willing to write almost anything [WorkSafe] wants in exchange for cash – with no regard for the damage they do when they behave in such a manner".[41]

[40] While they contain requests for access and correction, in my view, these types of requests are vexatious and abuses of the respondent's rights under FIPPA. I recognize that not all of the respondent's requests have been vexatious. However, a significant proportion of them have been, and that leads me to reasonably conclude that he will continue to make vexatious requests in the future. The pattern I described above, in which the respondent has made repeated follow-up requests in order to express displeasure with the responses to his previous requests, also supports this conclusion.

Discussion and conclusions on future relief

[41] I have found that the respondent has abused his access rights, and that future access requests from the respondent are likely to be vexatious. I therefore have decided to grant a remedy that will give WorkSafe some relief from future vexatious requests.

[42] I am not prepared to authorize WorkSafe to disregard all FIPPA requests from the respondent for three years. As far as I am aware, this office has not granted such a sweeping order even for cases where, for example, a respondent had made over 200 convoluted, detailed, and overlapping requests in less than two years.[42] WorkSafe does not point to any order that has granted such exceptional relief, and I think such an order would be disproportionate.

[43] In my view, a one-year restriction on access requests from the respondent will best serve the purposes of s. 43 by preventing likely future abuses of the right of access for a set period of time. I recognize that such a restriction, preventing the respondent from accessing information, including his own personal information, is serious.[43] In *Crocker*, the BC Supreme Court found that one of the remedies the Commissioner imposed – allowing the public body to

[39] *Ibid*, Exhibit CC.
[40] *Ibid*, Exhibit LL.
[41] *Ibid*, Exhibit RR.
[42] Order F20-15, 2020 BCIPC 17 (CanLII) at paras 34-38.
[43] See, e.g., *Mazhero v. British Columbia (Information and Privacy Commissioner)*, 1998 CanLII 6010 (BC SC) at paras 27-32.

disregard all requests from a respondent for a year – was "wholly disproportionate and clearly wrong", and would have set it aside.[44] However, the Court went on to find that such a remedy could be warranted in cases where, for example, the requests were "made habitually, persistently and in bad faith, or [were] clearly frivolous and vexatious".[45] In my view, the respondent's persistent pattern of making vexatious requests demonstrates that this is such a case.

[44] However, I am not prepared, at this time, to make an order restricting the respondent's right to make future correction requests. On the evidence before me, the respondent has made only four such requests: one in 2016, two in 2017, and one in 2023.[46] While, as I have found above, some of these correction requests have been vexatious, this pattern falls short of the persistent vexatiousness that I find warrants relief from future access requests.

[45] I do not wish to minimize the importance of the respondent's right to access information relating to his WorkSafe claim. WorkSafe says that it operates a secure online portal that allows claimants to see the contents of their claim file. It also says that it has a department dedicated to disclosures, through which claimants can request their claim file records. Finally, it says that when a claimant appeals a decision, claimants "automatically receive full disclosure of their unsevered claim file records" pursuant to the *Workers Compensation Act*.[47] I am satisfied, as was the adjudicator in Order F20-39, which also dealt with WorkSafe records,[48] that these means will allow the respondent to have access to information relating to his claim even while the access restrictions I am ordering continue to operate.

[46] WorkSafe also asks me to order that the respondent may not make any access requests for records which WorkSafe has previously provided to him.[49] I do not think such an order is necessary. Previous orders have established that public bodies are not normally required to disclose copies of records they have already provided to an access applicant, either through a previous request or by another avenue of access. A public body need only respond by identifying when those records were provided to the access applicant.[50] WorkSafe says that this approach has so far been "entirely ineffective" because the respondent's requests require "significant manual review" and WorkSafe has had to write to the respondent to inform him that the records he is requesting have already been

[44] The one-year restriction had already expired when *Crocker* was decided: *Crocker*, *supra* note 15 at paras 45 and 50.
[45] *Ibid* at para 46.
[46] Affidavit of Privacy Manager, Exhibit C.
[47] WorkSafe's initial submission at paras 14-18; Affidavit of Privacy Manager at paras 4-12.
[48] Order F20-39, *supra* note 11 at para 55.
[49] WorkSafe's initial submission at para 99.
[50] See, e.g., Decision F11-04, 2011 BCIPC 40 (CanLII) at para 15; Decision F10-09, 2010 BCIPC 47 (CanLII) at para 26; and Order F20-34, 2020 BCIPC 40 (CanLII) at para 49.

provided.[51] However, even if I were to make such an order, WorkSafe would still have to determine, with reference to the respondent's previous requests and its own responses, which records have already been provided. In my view, the respondent's requests have generally made it clear what records he is seeking. The only task such an order would spare WorkSafe would be making a brief response as set out above.

[47] It is readily apparent to me that the parties' relationship is difficult and characterized by mistrust. I am mindful that even the most sweeping order I could make under s. 43 would not stop the respondent from sending large volumes of correspondence to WorkSafe. However, I note in passing that WorkSafe does not need authorization from the OIPC under s. 43 to disregard pieces of correspondence to which it is not obliged to reply under FIPPA, such as questions or requests for clarification about his WorkSafe claim.[52] Further, nothing in this order precludes WorkSafe from applying under s. 43 to disregard a future request from the respondent.

Conclusion on s. 43

[48] To summarize, I have found that the Request is vexatious under s. 43(a), and so I have authorized WorkSafe to disregard it. I have found, based on a well-established pattern in the respondent's previous requests, that he is likely to make vexatious requests in the future. I have therefore granted WorkSafe some relief from these anticipated future requests by allowing it to disregard any access requests under s. 5 of FIPPA from the respondent for one year.

[49] In order for members of the public to exercise their access rights under FIPPA effectively, no one applicant must be allowed to abuse the system by making requests in bad faith or for an improper purpose. Requests under FIPPA are not a forum to air grievances, criticize a public body, or make accusations. As former Commissioner Loukidelis put it:

> 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 the legitimate exercise of that same right by others…Such abuse also harms the public interest, since it unnecessarily adds to public bodies' costs of complying with [FIPPA]. Section 43 exists, of course, to guard against abuse of the right of access.[53]

[51] WorkSafe's initial submission at paras 56-58.
[52] See, e.g., Order F21-14, 2021 BCIPC 18 (CanLII) at para 47.
[53] Decision-Auth (s43) 99-01, *supra* note 17 at 7-8.

CONCLUSION

[50] For the reasons given above, I make the following order under s. 43:

1. WorkSafe is authorized to disregard the respondent's January 10, 2024 access request.

2. WorkSafe is authorized, for a period of one year from the date of this order, to disregard any access request under s. 5 of FIPPA made by the respondent or on his behalf.

July 16, 2024

ORIGINAL SIGNED BY

David S. Adams, Adjudicator

OIPC File No.: F24-95874