



Order P26-03

COLLINGWOOD SCHOOL

D. Hans Hwang
Adjudicator

March 19, 2026

CanLII Cite: 2026 BCIPC 27
Quicklaw Cite: [2026] B.C.I.P.C.D. No. 27

Summary: A student made a request under the *Personal Information Protection Act* (PIPA) to Collingwood School (School) for access to his personal information. The School provided responsive records but withheld some information under ss. 23(3)(a) (solicitor-client privilege) and 23(4)(c) (personal information about another individual) of the *Personal Information Protection Act* (PIPA). The adjudicator found the School was authorized or required to refuse to disclose some of the information in dispute under ss. 23(3)(a) and 23(4)(c). The adjudicator ordered the School to disclose information that it was not authorized or required to withhold to the student.

Statutes Considered: *Personal Information Protection Act*, [SBC 2003] c. 63, ss. 1 (definition of “contact information”, “personal information” and “work product information”), 23(1)(a), 23(3)(a), 23(4)(c) and 23(5).

INTRODUCTION

[1] A lawyer, acting for a student (the Student) and his parents¹ (collectively, the applicants) requested access to information about the Student held by Collingwood School (the School). The School provided the applicants with records but withheld some information in the records under ss. 22(3)(a) (solicitor-client privilege) and 23(4)(c) (personal information about another individual) of the *Personal Information Protection Act* (PIPA).²

[2] The applicants asked the Office of the Information and Privacy Commissioner (OIPC) to review the School’s decision to withhold information.

¹ The Student was a minor at the time of the access request was made.

² From this point forward, unless otherwise specified, whenever I refer to section numbers I am referring to sections of PIPA.

[3] The OIPC's mediation process did not settle the issues, and the applicants requested the matter proceed to inquiry.

ISSUES

[4] The issues I must decide in this inquiry are whether:

1. Section 23(3)(a) authorizes the School to refuse access to the information in dispute.
2. Section 23(4)(c) requires the School to refuse access to the information in dispute.

[5] Section 51(1) places the burden on the School to prove that the applicant has no right to access the information in dispute.

BACKGROUND

[6] The School is an independent school, and the parties do not dispute that the School is subject to PIPA.³ The Student was enrolled as a student at the School when incidents took place (the Incidents). The School investigated the Incidents under its Student Code of Conduct. The Student faced consequences as a result of the outcome of this investigation.

[7] The applicants requested all information about the Student.

Preliminary issue, s. 8(1)(a)

[8] The applicants say that some of the disputed information can be released under s. 8(1)(a). Section 8(1)(a) says that an individual is deemed to consent to the collection, use or disclosure of personal information by an organization for a purpose if at the time the consent is deemed to be given, the purpose would be considered to be obvious to a reasonable person and the individual voluntarily provides the personal information to the organization for that purpose. They say that School staff's views and opinions about students at the School⁴ can be disclosed because School staff are deemed to have consented to disclose information they prepared in their employment duties.⁵

[9] Section 8(1)(a) is not listed as an issue in the OIPC investigator's fact report or the notice of inquiry. The notice of inquiry⁶ and past OIPC orders⁷ state that parties may only introduce new issues at the inquiry stage if they request

³ The parties do not dispute that the School is subject to PIPA.

⁴ The School withheld this information under s. 23(4)(c).

⁵ Applicants' response submission at para 19.

⁶ Notice of inquiry was provided to both parties at the start of this inquiry.

⁷ For example, Order F16-34, 2016 BCIPC 38 (CanLII) at para 9.

and receive prior permission from the OIPC to do so. The applicants did not request the OIPC's permission to add s. 8(1)(a) as an issue. They did not explain why they did not request permission to add this section prior to the inquiry, and they did not identify any exceptional circumstances which would warrant a departure from the OIPC's usual approach. Therefore, I do not need to consider s. 8(1)(a).

[10] However, for added clarity, I note that s. 8(1) is irrelevant in this case because the language of s. 23(4) does not allow the School to consider whether School staff have consented or are deemed to have consented to disclose information of other individuals.

[11] For the reasons above, I will not further consider s. 8(1)(a) in this order.

RECORDS AND INFORMATION AT ISSUE

[12] The School is withholding information from 662 pages of responsive records (Records Package 1). The records are comprised of correspondence and attachments to that correspondence.

Additional Records

[13] In its submissions, the School says that it is now withholding an additional 740 pages of responsive records (Records Package 2), which were not identified during the OIPC's investigation and mediation process.⁸

[14] I have considered whether it is fair for me to accept the additional records into this inquiry. The School entirely withheld these records under s. 23(3)(a) and provided a table of records which provides the date, page number, description and participants of each record.⁹ The applicants do not make any submissions about whether I should accept Records Package 2. Having considered these circumstances, I find that it is fair for me to accept Records Package 2 as records at issue in inquiry.

[15] As a result, the records responsive to the applicants' access request total 1,402 pages.

⁸ School's initial submission at para 4.

⁹ Affidavit #1 of Head of School, Exhibit A.

DISCUSSION

Personal information

[16] Under s. 23(1), an applicant has the right to access their own personal information under the control of the organization, subject to some exceptions set out in ss. 23(3) and 23(4). The information at issue must qualify as the applicant's personal information for access to be considered under s. 23(1)(a). Therefore, the first question I must answer is whether the information at issue is the Student's "personal information" as defined in PIPA.

[17] Under s. 1, "personal information" means information about an identifiable individual and includes employee personal information but does not include "contact information" or "work product information." Those terms are defined in s. 1 of PIPA as follows:

"contact information" means information to enable an individual at a place of business to be contacted and includes the name, position name or title, business telephone number, business email or business fax number of the individual;

"work product information" means information prepared or collected by an individual or group of individuals as part of the individual's or group's responsibilities or activities related to the individual's or group's employment or business but does not include personal information about an individual who did not prepare or collect the personal information.

[18] Information is about an identifiable individual if it is reasonably capable of identifying a particular individual, either alone or when combined with other available sources of information.

[19] I find that some of the information at issue is about the Student because it mentions him by name. For example, the School withheld information in correspondence between the applicants' lawyer and School staff in which the Student is named,¹⁰ and emails between School staff talking about the Student.¹¹

[20] This information is not the Student's work product information in this context, because it was not prepared or collected by the Student. It is also not the Student's contact information as defined in PIPA because it is not information to enable him to be contacted at his place of business.

[21] However, I find that a significant amount of the information at issue is not about the Student. For example, I find personal greetings and compliments

¹⁰ For example, information on pages 412, 539, 619 and 623 of Records Package 1.

¹¹ For example, information on pages 99, 111, 119, 318, 324, 328, 329, 350, 360, 375, 439 of Records Package 1.

exchanged between School staff do not contain personal information of the Student.¹² Also, much of the information withheld in emails at issue was communications between School staff, and none of this information is about the Student. This information is about attendance and academic performance of other students at the School,¹³ and their email addresses¹⁴ and financial information.¹⁵ It is also a list of students who completed certain forms.¹⁶ The applicants have no right of access to any of this information under s. 23, so I will not consider it any further.

[22] I turn now to consider whether the School is required to withhold the Student's personal information under ss. 23(3)(a) or 23(4)(c).

Solicitor-client privilege, s. 23(3)(a)

[23] The School entirely withheld 178 emails and approximately three documents attached to the emails in Records Package 2 under s. 23(3)(a). It also withheld portions of emails in Records Package 1 under this section.

[24] Section 23(3)(a) states that an organization is not required to disclose personal information that is protected by solicitor-client privilege. The term "solicitor-client privilege" includes both legal advice privilege and litigation privilege.¹⁷

Sufficiency of evidence to substantiate the s. 23(3)(a) claim

[25] The School did not provide the information it withheld under s. 23(3)(a) for my review. Instead, it provided sworn affidavit evidence from a lawyer who represented the School (the School Lawyer) and two tables of records¹⁸ to support its claims that the information is protected by legal advice privilege.

[26] Section 38(1)(b) gives me, as the Commissioner's delegate, the power to order production of documents to review them during the inquiry. However, given the importance of solicitor-client privilege, and in order to minimally infringe on

¹² Pages 100, 117, 121, 132, 166, 271, 290, 307, 360, 376, 386, 389, 491, 498, 501, 661 of Records Package 1.

¹³ For example, information on pages 101, 103, 107-108, 116, 117, 121, 145, 262, 263, 269, 274, 275, 281, 282, 320-322, 330, 376, 418, 424-426, 428, 436, 441, 442, 444, 447, 450-453, 456, 457, 474, 513-516, 528-530, 662 of Records Package 1.

¹⁴ For example, information on pages 144, 146, 420, 422, 428, 533-534, 538, 565, 572 of Records Package 1.

¹⁵ For example, information on pages 75, 79-89, 94-98 of Records Package 1.

¹⁶ For example, information on pages 104-106 of Records Package 1.

¹⁷ Order P20-01, 2020 BCIPC 6 (CanLII) at para 14.

¹⁸ School Lawyer's Affidavit #1, Exhibit B (for Records Package 2); Table of Severed Records the School provided to me along with Records Package 1.

that privilege, I would only order production of documents being withheld under s. 23(3)(a) when it is absolutely necessary to fairly decide the issues in dispute.

[27] Past court cases and OIPC orders have discussed the evidence required to establish solicitor-client privilege in the absence of the records. Although there are no steadfast rules and each case depends on its own facts, some general rules have been established, including that:

- a party claiming privilege must list each disputed record separately and provide, without revealing privileged information, a description of the record in sufficient detail to allow one to assess the claim of privilege;
- the description of the record should include the date it was created or sent, the type of communication (e.g., “email”) and the names of the author and the recipient(s);
- in addition to a proper description of the disputed records, the party claiming privilege must provide evidence to substantiate the privilege claim;
- ideally, affidavit evidence in support of a privilege claim should avoid hearsay and come from an affiant with direct knowledge of the disputed records; and
- it is helpful, and in some cases even necessary, to have affidavit evidence from a lawyer, who is an officer of the court and has a professional duty to ensure that privilege is properly claimed.¹⁹

[28] I am satisfied the School provided a sufficient evidentiary basis for me to determine whether the information it withheld under s. 23(3)(a) is subject to solicitor-client privilege. I find that the School’s tables of records provide sufficient explanation about the information in dispute, specifically, the date, page number, description of the information, participants for each record, and the grounds on which privilege is claimed.²⁰

[29] I can see that the School Lawyer has direct knowledge of the information on which the School claims solicitor-client privilege, and he was directly involved in some of the communications at issue.²¹ He is also a practising lawyer and, as an officer of the court, he has a professional duty to ensure privilege is properly claimed.²²

¹⁹ *British Columbia (Minister of Finance) v British Columbia (Information and Privacy Commissioner)*, 2021 BCSC 266 at paras 76-93; Order F20-16, 2020 BCIPC 18 (CanLII) at paras 8-10.

²⁰ Lawyer’s affidavit #1, Exhibit B – Table of privileged records; Table of severed records.

²¹ Lawyer’s affidavit #1 at paras 1 and 6.

²² See *British Columbia (Minister of Finance) v. British Columbia (Information and Privacy Commissioner)*, 2021 BCSC 266 (CanLII) at para 86. See also Order F20-16, 2020 BCIPC 18 (CanLII) at para 10 and *Nelson and District Credit Union v. Fiserv Solutions of Canada, Inc. (Master)*, 2017 BCSC 1139 at para 54.

[30] Considering all of the above, I am satisfied that I have a sufficient evidentiary basis on which to make my s. 23(3)(a) decision.

Legal advice privilege

[31] The School says that the information withheld under s. 23(3)(a) is subject to legal advice privilege.²³

[32] Legal advice privilege applies to communications that:

1. are between solicitor and client,
2. entail the seeking or giving of legal advice and
3. are intended to be confidential by the parties.²⁴

[33] In addition, legal advice privilege extends to other kinds of documents and communications that do not strictly meet the above test. For example, legal advice privilege applies to the “continuum of communications” between lawyer and client that do not specifically request or offer advice but are “part of the necessary exchange of information between solicitor and client for the purpose of providing advice.”²⁵

Parties’ submissions

[34] The School submits that the information in dispute consists of communications between the School Lawyer and School staff for the purpose of seeking, formulating or giving legal advice, which were intended to be confidential.²⁶ The School says that some of the information in dispute forms internal communications exchanged between School staff members for the purpose of seeking and obtaining legal advice.²⁷ The School also says it applied legal advice privilege to the continuum of communications between School staff and individuals who professionally assist the School Lawyer in providing or preparing legal advice, such as legal assistants, paralegals and other lawyers employed by the same law firm where the lawyer works.²⁸

[35] The applicants submit that they are not in a position to argue about legal advice privilege because they had no access to the records at issue.²⁹

²³ School’s initial submission at paras 61-64.

²⁴ *Solosky v The Queen*, 1979 CanLII 9 (SCC) at p 847.

²⁵ *Camp Development Corporation v South Coast Greater Vancouver Transportation Authority*, 2011 BCSC 88 at para 42.

²⁶ School’s initial submission at paras 61-64.

²⁷ School’s initial submission at para 63.

²⁸ School’s initial submission at para 61.

²⁹ Applicant’s response submission at para 11.

Analysis and findings

[36] Based on the descriptions in the tables of records, I find that the information at issue under s. 23(3)(a) is as follows:

- Emails between School staff and the School Lawyer;³⁰
- Emails between School staff and a paralegal, legal assistants or other lawyers working with the School Lawyer;³¹
- Emails between School staff members;³²
- Emails between School staff and the School board of governance members;³³ and
- The name of a lawyer for the School who was bcc'd on emails between the head of the School and the applicants' lawyer.³⁴

[37] Based on the School's evidence³⁵ and the tables of records, I find the School was in a solicitor-client relationship with the School Lawyer at all relevant times during the School's handling of the Incidents. I find that the information in the emails between School staff and the School Lawyer is comprised of confidential communications between a lawyer and his clients which entail seeing and giving of legal advice.

[38] Some of the information in dispute includes communications between School staff and the School Lawyer's legal assistants, paralegals or other lawyers working with the School Lawyer. The Supreme Court of Canada has

³⁰ Pages 66-70, 71-76, 77-82, 83-86, 87-91, 92-93, 94-96, 97-98, 99-101, 102-105, 106-111, 115, 146-147, 148, 150-151, 152-157, 158-165, 166, 167-171, 172-178, 179-183, 184-187, 188-190, 191-196, 197-199, 200-203, 204-205, 206-210, 211-213, 214-217, 218-219, 220, 221, 222-226, 227-229, 230-237, 238-240, 241, 243, 244-248, 249-252, 253, 256-258, 269-261, 262-268, 278-286, 287-293, 310-312, 316-321, 322-325, 326-332, 333-339, 344-345, 346, 350-351, 352, 364-368, 369-374, 375-378, 379-385, 386-389, 390-395, 396-399, 400-403, 404-407, 408-409, 410-412, 413-414, 415-418, 419, 420, 421-422, 423, 424, 425-426, 427-429, 430-431, 432-434, 435-438, 439-441, 442-445, 446-447, 448-452, 453-455, 456, 460-461, 462-464, 465-467, 468-469, 470-471, 472-473, 474-475, 476-478, 479-482, 483-485, 486-487, 488-489, 490-491, 492-493, 569-587, 593-597, 598-604, 605, 606-609, 610-613, 615-618, 619-620, 621-625, 626-628, 629-632, 633-635, 636-637, 638-639, 640-641, 642-643, 644, 645-651, 652-657, 658-661, 662-666, 667-669, 670-673, 674-676, 677-686, 739, 740 of Records Package 2; page 379-380 of Records Package 1.

³¹ Pages 269-277, 278-286, 287-293, 294-298, 299-305, 306-309, 313-315, 494-502, 503-515, 516-523, 524-531, 532-543, 544-550, 551-561, 562-568, 570-578, 579-578, 579-587, 588-592, 593-597, 614 of Records Package 2.

³² Pages 1-3, 4-11, 56-58, 116-120, 121-125, 126-129, 130-133, 134-137, 142-145, 340-341, 342, 343, 352-354, 355, 356, 357, 358, 359, 360-361, 362, 363, 687-694, 695-697, 698-726, 727-730, 731-738 of Records Package 2.

³³ Pages 12, 13-16, 17-20, 21-23, 24-26, 27-28, 29-30, 31-32, 33-39, 40-47, 48-55, 59-65 of Records Package 2.

³⁴ Pages 544, 548, 550, 551, 552, 555, 558, 560, 562, 567, 571, 574, 576, 581, 585, 588, 590, 592, 594, 597, 602, 606, 607, 611, 614, 615, 618, 622, 625 of Records Package 1.

³⁵ Head of School's affidavit #1 at paras 6-7.

stated that the solicitor-client relationship extends to those who professionally assist lawyers in providing or preparing legal advice.³⁶ I accept the evidence³⁷ that these communications contain direct correspondence between the School Lawyer and the School for the purpose of giving and receiving legal advice.

[39] With respect to emails between School staff members and emails between School staff and the School board of governance members, I find these fall within the continuum of communications and are privileged on that basis. I am satisfied with the description of these communications that each of these communications involves these staff members and board members discussing the School Lawyer's legal advice. It is well-established that legal advice privilege includes communications between employees which transmit or comment on privileged communications with lawyers.³⁸ I find that discussions about legal advice between School staff and board members were confidential communications commenting on the School Lawyer's legal advice. In my view, releasing these communications would reveal the substance of legal advice the School sought and received from the School Lawyer. Therefore, I find these communications are privileged.

[40] Considering all of the above, I conclude that all the information withheld in Records Package 2 contains confidential communications between a lawyer and his client which took place for the purpose of seeking and giving of legal advice, so legal advice privilege applies. In conclusion, I find that all three parts of the test for legal advice privilege are met. Disclosing the withheld information would reveal the confidential communications between the School and the School Lawyer about legal advice.

[41] However, I find that a lawyer's name which was bcc'd on emails in Records Package 1 is not a *communication* that entails the seeking or giving of legal advice. I do not see, and the School does not explain, how this qualifies as a privileged information under s. 23(3)(a).

[42] For the above reasons, I conclude that most of the information withheld under s. 23(3)(a) is protected by legal advice privilege, and it may be withheld on that basis.

Personal information about another individual, s. 23(4)(c)

[43] Section 23(4)(c) requires an organization to withhold information that would reveal personal information about another individual. In considering what

³⁶ *Descoteaux et al. v. Mierzwinski*, 1982 CanLII 22 (SCC), [1982] 1 S.C.R. 860 at pp 872-873; see also Order F19-33, 2019 BCIPC 36 (CanLII) at para 23.

³⁷ School Lawyer's Affidavit #1, Exhibit B – Table of privileged records.

³⁸ *Bank of Montreal v Tortora*, 2010 BCSC 1430 at para 12.

information may be withheld under s. 23(4)(c), I note that the term “another individual” under this provision refers to an individual other than the applicants.³⁹ Therefore, the purpose of s. 23(4)(c) is to protect the personal information of people other than the applicants. As a result, the first step under s. 23(4)(c) is to determine if the information at issue is, in addition to being about the Student, also “about an identifiable individual” other than the applicants.⁴⁰

Parties’ submissions

[44] The School says personal information of other students is not disclosable because they were interviewed as witnesses in the School’s investigation of the Incidents, and their personal information was collected in the context of the student-conduct incident investigation.⁴¹

[45] The applicants argue that others’ opinions, thoughts and feelings about the Student can be disclosed because they are not personal information.⁴² The applicants also argue that the School must disclose the information at issue because it was collected or used for a purpose related to the Student.⁴³

[46] The School rejects the applicants’ arguments.⁴⁴

Analysis and findings

[47] The Student’s personal information at issue under s. 23(4)(c) is in the following records:

- Emails between School staff;⁴⁵
- Interview questions⁴⁶ and students’ statements;⁴⁷
- Communications between the applicants (and their lawyer) and the School.⁴⁸

[48] I find most of the information in dispute would reveal personal information of other individuals.

³⁹ Order P14-03, 2014 BCIPC 49 (CanLII) at para 13. Order P11-01, 2011 BCIPC 9 (CanLII) at para 17.

⁴⁰ Order P13-01, 2013 BCIPC 23 (CanLII) at para 16.

⁴¹ School’s initial submission at paras 43 and 46.

⁴² Applicant’s response submission at para 14.

⁴³ Applicants’ response submission at paras 22 and 23, citing Order P24-01, 2025 BCIPC 3 (CanLII) at paras 19-20 and P22-06, 2022 BCIPC 54 (CanLII) at paras 25, 27 and 28.

⁴⁴ School’s reply submission at paras 7-11.

⁴⁵ Pages 58, 99, 100-101, 111, 117, 119, 132, 135, 137, 138, 139, 145, 166, 271, 290, 307, 315, 318, 324, 326, 328, 329, 350, 360, 375, 376, 379, 386, 389, 433, 439, 491, 498, 501, 632, 635-639 of Records Package 1.

⁴⁶ Pages 331 and 332 of Records Package 1.

⁴⁷ Pages 336-349, 350-359, 630, 631, 634, 642-654, 660-661 of Records Package 1.

⁴⁸ Pages 192, 224, 230, 239, 311, 326, 412, 539, 569, 572, 619 and 623 of Records Package 1.

[49] The emails between School staff are communications about the Incidents.⁴⁹ These communications include information about other students, who are identified by name. Even if the students' names were removed, the information in these communications is capable of identifying the students. This information is intertwined with the Student's personal information. I find this information is simultaneously about these students and about the Student.

[50] I find the information withheld in the interview questions and students' statements include information about multiple students at the School, and this information is intertwined with the Student's personal information. For example, the students' statements explain interactions between the Student and other students and interactions between the Student and interviewees who provided these statements. Also, the disputed information in the interview questions contains name of other students, and is intertwined with the Student's personal information. As a result, I find this information is simultaneously about the Student and other students.

[51] I note that the School withheld information about other individuals that is already known to the applicants since it was withheld from correspondence that the applicants or their lawyer wrote to the School.⁵⁰ However, s. 23(4)(c) is a mandatory exclusion to access under PIPA that does not take in account relevant factors and circumstances such as whether the applicants already know or can easily determine the personal information that the School has withheld about these other individuals. Therefore, the applicants' prior knowledge is not a consideration when applying s. 23(4)(c). I find the School is required to withhold this information.⁵¹

[52] The applicants argue that considering the purpose of PIPA in s. 2, School staff's opinions, thoughts and feelings about the Student which were prepared in the staff's employment duties can be disclosed.⁵² I understand the applicants to be saying that School staff's statements about the Student is work product information which the School is not required to withhold. I note that the work product information argument could only reasonably be raised about the personal information of School staff who prepared or collected information. This is not the case here, and I therefore reject the applicants' argument on this point.

[53] Overall, I find that none of the disputed information is work product information. First, personal information about an individual who did not prepare or collect the personal information is not work product information. The withheld

⁴⁹ For example, pages 58, 99, 111, 119, 318, 324, 326, 328, 329, 350, 360, 375, 439, 569 of Records Package 1.

⁵⁰ Pages 192, 224, 230, 311, 326, 412, 539, 569, 572, 619 and 623 of Records Package 1.

⁵¹ For similar reasoning, Order P22-06, 2022 BCIPC 54 at paras 64-67.

⁵² Applicant's response submission at paras 14-18.

information is about the Student and other students at the school who did not prepare or collect the personal information in the responsive records. Second, the Student and other students at the school are not employees and, therefore, did not prepare or collect their statements as part of their employment responsibilities or activities.

[54] For these reasons, I conclude that s. 23(4)(c) applies to most of the Student's personal information because it would reveal the personal information of other individuals. However, s. 23(4)(c) does not apply to a small amount of the information in dispute.

Severance, s. 23(5)

[55] Section 23(5) says that if an organization is able to remove the information referred to in ss. 23(3)(a), (b) or (c) or 23(4) from a document that contains personal information about the individual who requested it, the organization must provide the individual with access to the personal information after the information referred to in ss. 23(3)(a), (b) or (c) or 23(4) is removed.

[56] I have found that ss. 23(3)(a) and 23(4)(c) apply to most of the applicant's personal information. In my view, the applicant's personal information is so intertwined with the information that the School can or must withhold under ss. 23(3)(a) and 23(4)(c) that it is not possible to provide the applicant with that information. Therefore, I conclude that severance is not required under s. 23(5).

CONCLUSION

[57] For the reasons given above, under s. 52 of PIPA, I make the following order:

1. Subject to Item 2 below, I confirm in part the School's decision to refuse to access to the information withheld under ss. 23(3)(a) or 23(4)(c).
2. I require the School to give the applicant access to the information that I have found it is not required or authorized to withhold under ss. 23(3)(a) or 23(4)(c), which is on pages 100, 117, 121, 132, 166, 271, 290, 307, 360, 376, 386, 389, 491, 498, 501, 539, 544, 548, 550, 551, 552, 555, 558, 560, 562, 567, 571, 574, 576, 581, 585, 588, 590, 592, 594, 597, 602, 606, 607, 611, 614, 615, 618, 622, 625 and 661 of Records Package 1. As a courtesy, I have highlighted this information in green on the copy of the records that will be provided to the School with this order.
3. The School must provide the OIPC registrar of inquires with a copy of the records it provides the applicants in compliance with this order.

[58] Under s. 53 of PIPA, the School is required to comply with this order by **May 4, 2026**.

March 19, 2026

ORIGINAL SIGNED BY

D. Hans Hwang, Adjudicator

OIPC File No.: P23-93954