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File 00916.00024

Chair and Members, Government
Management Committee
City of Toronto
Toronto City Hall, 2nd Floor
100 Queen Street West
Toronto, ON M5H 2N2

Dear Chair Lindsay Luby and Members of the Committee:

Re: Opinion Regarding Council Member "Read Only" Access to the Integrated Business Management System (IBMS)

Your Committee, at its meeting held on April 17, 2008, had before it a report dated April 8, 2008 from the City Solicitor, transmitting my written legal opinion, dated April 4, 2008, regarding Council Member "Read Only" Access to the IBMS, provided to the City in response to the request by City Council made at its meeting held on September 26-27, 2007.

Your Committee at that time:

1. Deferred this item until its next meeting.

2. Requested the Clerk to provide to members of the Committee the actual minutes of Council that delegated the function of HEAD to the City Clerk.

3. Requested me "to comment on how the delegation of HEAD under MFIPPA could be modified in a way that separates out the administrative functions of the role of the City Clerk and yet still permits Council to retain the position of HEAD".

4. "If it can be proved that Council has, in fact, delegated the position of HEAD to the [City] Clerk, requested [me] to advise how this delegation can be rescinded or modified in a manner that will permit members of Council access to the information that they require."

My response to the requests contained in paragraphs 3 and 4 of the Committee's decision, are as follows:

RESPONSE WITH RESPECT TO PARAGRAPH 3:

POSSIBLE MODIFICATION OF THE DELEGATION OF POWERS AND DUTIES OF THE HEAD UNDER THE MUNICIPAL FREEDOM OF INFORMATION AND PROTECTION OF PRIVACY ACT ("MFIPPA")

Hypothetical Nature of the Issue

In the drafting of this report, as in the case of my previous one, I had to deal with issues in a vacuum, in that I have not been provided with any examples or fact situations in which a member of Council properly sought, but was denied, access to corporate records or information.

The members of Council whom I interviewed during the preparation of my original report made it clear that they were not interested in obtaining personal or law enforcement information. In view of this fact, and in view of my conclusion that virtually all of the information sought by Councillors which led to the request for my reports is already available in one form or another, to them and all members of the public, it does not appear to have been established that there is any need to modify the ongoing decision of City Council to delegate the powers and duties of the Head under MFIPPA to the City Clerk, as authorized by section 49(1) of MFIPPA.

To the best of my knowledge, it has been the consistent practice of municipalities across the Province to delegate the powers and duties of Head to the Clerk or other staff. I am not aware of any instance in which a municipal council has taken upon itself the powers, duties or functions of the Head.

The Comprehensive Jurisdiction and Duties of the Head

MFIPPA establishes the role of "Head" for the purposes of that Act (referred to herein as the "Head"), who embodies and acts on behalf of the municipality (referred to as the "institution") in making decisions and implementing acts of compliance with the Act in relation to requests for access to records received by the institution.

In fulfilling that role, the functionary exercising the powers and duties of the Head is given the jurisdiction to form and give effect to opinions, disclose records, refuse to disclose records, require the severance of records, exercise discretion in the application of permissive exemptions, apply mandatory exemptions, and generally ensure the proper processing of all such requests in compliance with the requirements of MFIPPA.

Issues of Logistics

MFIPPA imposes a substantial and comprehensive number of specific duties on the Head in responding to requests for access. It is difficult to imagine the Council (or indeed any collective body) being able to meet regularly and frequently enough to enable it to function as the Head, particularly in view of the requirement imposed by section 19 of MFIPPA that the Head, within 30 days after a request for access is received, is to give written notice to the person who made the request as to whether or not access to the record or part of it will be given, including, where access is denied, the reason why access is refused, with specific reference to the applicable statutory provision.

The Head has the power to extend that time limit where an extended search required would interfere with the operations of the institution, or a longer time is required for outside consultation. In such a case, the Head must provide the requester with notice of the length and reasons for the extension and the right to request the Commissioner to review the extension. For the Council to make even this decision would require it to hold a meeting.

Similarly, if the Head refuses to give access to a record because of the opinion of the Head that the request for access is frivolous or vexatious, that must be included in the notice given, together with notice that the requester may appeal to the Commissioner for a review of that decision.

In any event, the Head must be set up to respond quickly to every request. The Act in all cases anticipates decision-making appropriate to the nature of the request, within a relatively short period of time.

Time periods are also imposed on other potential responses by the Head, such as giving notice that the information sought affects the interest of a third party, and providing notice to such third party of the right to make representations to the Head as to why the record or part should not be disclosed, within 20 days after the notice is given.

The Head giving notice to a person in such circumstances must also include in the notice that the Head will decide within 30 days whether or not to disclose the record.

In 2007, the City of Toronto received 5,203 applications for access to City records. On the basis of past experience, this number is likely to continue to increase from year to year.

Clearly, a city council, particularly one as large as that of the City of Toronto, is simply not capable of holding the number of meetings necessary to comply with all of the requirements of

the Act with respect to 100 requests a week, let alone deal with the drafting and approval of the Council's reasons in addressing each request which it has decided not to grant.

During the year 2007, the Clerk's Department reviewed 195,000 documents which were the subject of access requests under MFIPPA, severing over 33,000 pages from those disclosed. In terms of access requests overall, of the 5,203 access requests received by the City in 2007, 1,681 required the application of MFIPPA exemptions. It is noted that in each year the City, as in the case of other institutions in Ontario, has received large increases in the number of FOI requests, although the City's increase for this past year has been brought down substantially, in large part due to the development of the City's routine disclosure program.

Among the decisions delegated to the Head, and which therefore would have to be made by the Council, would be the following with respect to each request for access:

- whether or not a record sought includes personal information;
- whether or not any of the mandatory or discretionary exemptions apply to disclosure;
- whether or not the request is frivolous or vexatious;
- whether or not another institution has custody or control of the records sought;
- whether or not there is a need to extend the time limit for responding to a request, and the period of time that is reasonable in the circumstances;
- whether or not a request is frivolous or vexatious;
- whether or not a record contains information that affects the interest of a person other than the person requesting the information.

The discretionary nature of so many of the responsibilities exercisable by the Head would render inappropriate whatever theoretical possibility might exist of attempting to separate the quasi-judicial responsibilities of the position of Head from administrative duties, which would be performed in any event by staff, with respect to the processing of requests for access under the Act. With respect to all issues of interpretation and discretionary functions and duties of the Head as set out in MFIPPA, the Act clearly anticipates that all such responsibilities shall be exercised by the functionary holding that position.

It would be impractical and unworkable to anticipate that the members of City Council would have the time available to become involved in participating in the performance of the role of the Head.

The Council is not an Appropriate Body to Function as MFIPPA Head

Of particular concern at the outset is the fact that Council consideration and decision-making with respect to requests for access would involve a significant number of in camera meetings of Council, in view of the fact that section 239(3) of the *Municipal Act, 2001* requires that council meetings to consider MFIPPA requests be closed to the public. The holding of such meetings by statutory mandate will inevitably cause confusion, particularly in view of current evolution of Council procedures toward more open record-keeping and maintenance of public records.

Of more immediate legal concern is the fact that the role of the MFIPPA Head is to comply strictly with the requirements of MFIPPA, involving the strict interpretation and application of legal requirements, not involving the exercise of the policy-making or political role normally exercised under the powers granted to municipal councils.

Were the Council as a whole to exercise the decision-making responsibilities of the MFIPPA Head, it would have to adopt a meeting timetable sufficient to enable it to meet the tight time limitation periods imposed by MFIPPA for responding to requests for disclosure of records, with respect to each request, and to develop procedures and timetables for receiving reports (without recommendations) from staff, and developing and articulating its reasons for decisions refusing or delaying disclosure, where required by the Act.

The proposal under discussion would involve Council's having to receive and review each such request for the purposes of making its own decisions such as those referred to above. It would also have to establish ways to ensure that all records and information believed by the Council to be relevant to its decision-making have been duly retrieved from all involved program areas.

It would also involve the Council's receiving representations from persons to whom requested information relates as to why a record or part thereof should not be disclosed, although such representations would be made in writing unless the Head requires them to be made orally.

Members of the Council would also participate in the formulation and drafting of reasons for certain of its decisions, under sections 20.1, 22(1) and 22(3) of MFIPPA.

Where, as is often the case, a particular request for access covers a large number of records, it has been the practice of the IPC office to request an index of records, including the number of

records in issue, the title or description of each record, the first and last page number for each record, and an indication of the specific information relating to exemptions claimed in respect of each record, where access is refused, or some information is redacted or severed from records to which access is granted. This would also become a Council responsibility.

It may also be the case that one or more members may have to declare interests under the *Municipal Conflict of Interest Act*, such as where an individual member of Council has filed a request for access or is the subject of a privacy complaint lodged against the City by a member of the public.

These results could all occur as a result of Council itself fulfilling the role of Head for the purposes of MFIPPA.

Specifically, with respect to a request for access under Part I of the Act, the Council would be required, collectively, to exercise the following powers, duties and responsibilities:

- upon receipt of a request for access, **determination** of the relevant facts and circumstances surrounding the application, presumably on the basis of a report by the Clerk, addressing factors relevant to decision-making by the Head, including whether or not the City has such a record and if not, whether the request should be forwarded to another institution;

- in view of the fact that disclosure of information could impact on the pecuniary interest of one or more members of Council, and the Council would be fulfilling the role of Head through the holding of meetings, the *Municipal Conflict of Interest Act* would apply, and each member of Council would have to ensure that no decision of the Council as Head would be a subject in which that he or she might have a pecuniary interest, and that the Act is complied with in every respect;

- **decision** as to whether or not the Council is of the opinion on reasonable grounds that the request is frivolous or vexatious (s. 17(1.1));

- **decision**, within 30 days after the request is received, providing notice as to whether or not access to the record or part of it will be given (s. 19);

- **decision** as to whether or not to extend, for a period of time that is reasonable in the circumstances, the time limit for responding, as set out in section 20 of MFIPPA;

- the provision of **reasons for opinion** where the Head has found a request frivolous or vexatious (s. 20.1);
- **decision** as to whether or not information sought affects the interest of a person other than the person requesting the information so that written notice may be provided to that person (s. 21(1)(a));
- **decision** that the Council has reason to believe that personal information sought may constitute an unjustified invasion of personal privacy so that notice may be provided to the person to whom the information relates (s. 21(1)(b));
- following the **hearing of representations** from any person affected by the information, **decision** as to whether or not to disclose the record or part and the provision of written notice of the decision to the person to whom the information relates and to the requester (s. 21(5), (6) and (7));
- **decision** as to whether or not any of the discretionary exemptions may apply with respect to disclosure of the document, including whether or not to refuse to confirm or deny the existence of a record with respect to certain matters such as law enforcement or unjustified invasion of personal privacy (s. 22(2));
- in the case of a refusal to disclose a record or part, **decision** as to the provision of the Act upon which access is refused, and the **reasons** why the provision applies to the record (ss. 21(7) and 22(3)).

In view of the type of decision-making involved and the strict timelines laid down by MFIPPA, it does not appear that the Act anticipates that decision-making of the Head would be performed by a group, let alone a body of 45 members (although MFIPPA would authorize the Council to designate one of its member, or a committee, to act as the Head).

The addition to Council duties of an ongoing responsibility for decision-making in this context would also appear to be a departure from the more generalized statutory role of Council to represent the public and consider the well-being and interests of the municipality, to develop and evaluate policies and programs for the City, and to determine which services the municipality provides.

It is important also to understand the nature of the quasi-judicial decision-making jurisdiction performed by the Head, which would preclude the Council, if it were to take that function upon

itself, from receiving recommendations from staff with respect to whether or not to grant any particular request for access.

While some requests for access are relatively simple and straight-forward, involving little in the way of documentation, some individual requests involve review of thousands of pages of documents.

Also, with respect to requests in which notice must be given to the person to whom the personal information relates, and representations received as to whether or not any particular access to personal information should be granted or denied, the Council would hear or receive such representations, and make its own decision as to whether or not the request should be granted, and if so, upon what terms.

The Council would form its own reasons in each case for its decision as to whether or not access to information would be granted or denied, as with the exercise of its other discretionary decision-making under the Act.

Section 39 of MFIPPA authorizes a person to appeal certain decisions of the Head to the Provincial Information and Privacy Commissioner arising out of requests for access to records for personal information. Under section 41(13) of the Act, the Head of the institution concerned is given the opportunity to make representations to the Commissioner, a role now fulfilled by the Clerk.

RESPONSE WITH RESPECT TO PARAGRAPH 4:

HOW THE CURRENT DELEGATION OF POWERS AND DUTIES TO THE CLERK "CAN BE RESCINDED OR MODIFIED IN A MANNER THAT WILL PERMIT MEMBERS OF COUNCIL ACCESS TO THE INFORMATION THAT THEY REQUIRE"

Once again, this request appears to be based on an assumption that there is information required by members of Council which is not now available to them, a premise which has not been substantiated nor any examples given.

In my report of April 4, 2008 to the Council with respect to issues involving access to information by members of Council, I concluded as follows:

- Substantially all of the information sought by Councillors is available to members of Council and members of the public as of right, in most cases the subject of current or planned routine disclosure policies.

- Members of Council have access to all building plans, under confidential cover, at the present time, and would have access to most of the information contained in the IBMS and 3-1-1 databases, with the exception of personal information, which the Councillors have advised they do not require, and information relating to the enforcement process, which is not within the responsibilities of individual Councillors.

Consequently, this new request, by implicitly assuming that there is information which members of Council require but to which they do not now have access, is based on a premise inconsistent with the conclusions contained in my opinion letter.

To the extent there may be information sought by Councillors which is not available to them at the present time, I have not identified any causative impediment to access arising from the fact that Council has delegated all of the powers and duties of the Head for MFIPPA to its Clerk.

As discussed in my opinion letter of April 4, 2008, to the extent that members of Council believe that they do not have access to information which they require in the performance of their roles, such is not primarily due to MFIPPA or its manner of implementation, but is a product of the City's spending and resource priorities, with significant progress ongoing in the development of substantially improved access to information by both Councillors and members of the public.

The wording of this request appears to assume that, were the Council to itself exercise all of the powers of the Head under MFIPPA, individual members of Council themselves would be given increased access to municipal information and records which they require, whereas the current structure of decision-making constitutes a bar to such disclosure.

This appears to be based on an assumption that were the Council to function as Head, its members would have unlimited access to all information in the custody and control of the City, or that elected members would have no difficulty in convincing their fellow members of their need for the information in question.

Contrary to both of these suppositions, however, it is my opinion that, for members of Council, while participating in fulfilment of the Council's functioning as MFIPPA Head would certainly impose new responsibilities upon them, such would not in law involve expanding the lawful access of individual members to records to which they do not now have access.

The current Head under MFIPPA, as in the case with such functionaries across the Province, does not, by reason of that position, have access as of right to any and every City record, nor to all personal information and law enforcement information held by the City. For the purposes of

MFIPPA, the City Clerk may view only those records responsive to an access request or subject of an alleged privacy breach, in order to carry out an investigation.

Additionally, having individual members of Council function collectively as Head will involve the imposition of a number of legal requirements upon their conduct, involving, in addition to requirements of the Code of Conduct, the imposition of duties of confidentiality and the duty to preserve individual privacy where such is intended by the Act. The members would not be in a position to communicate or make use of information which they obtained through the fulfilment of these duties, and should a requester or the person whose information is the subject-matter of the request commence litigation, the members of Council could become witnesses in any inquiry or legal proceedings which resulted.

In addressing the issues dealt with in this opinion letter, I have reviewed the memorandum dated April 17, 2008 from Councillor Howard Moscoe to this Committee, for the purpose of addressing the grounds upon which he relies in advocating that the Council terminate its delegation of powers and duties to the City Clerk, and exercise them itself.

Assumptions suggested in the memorandum from Councillor Moscoe as a basis of support for the decision-making duties under MFIPPA to be exercised by the Council (which could, as mentioned above, include one or more members, or a committee of members) are premised on the suggestion that members of Council cannot now fulfil their roles effectively, due to an inability to obtain information, whereas if Council itself were to function as the MFIPPA Head, it would decide things differently, or at least be more likely to grant requests made by its members. Councillor Moscoe suggests, as an example, the case of Mr. Tabello, the individual responsible for making over 600 requests to the City for access to records over the last year, in respect of which it is speculated that all of the information he is seeking "would have been freely given" by City Council.

With respect to the order in the *Tabello* case, the issue was not whether or not the type of information in question was of such a nature that it was disclosable or exempt from disclosure under any of the provisions of MFIPPA, simply the impact of the 630+ requests by the same requester for a large body of information imposed substantial costs and problems for the City in satisfying that one individual's access requests. There is no suggestion that the City's reasons for non-disclosure in the exercise of delegated authority in that case was made for any purpose inconsistent with the principles inherent in either in MFIPPA or the *City of Toronto Act, 2006*, or that Council as a whole, exercising the duties of the Head, would have made any different decision.

The Order of the Information and Privacy Commissioner/Ontario (Order MO-2289), issued by IPC Adjudicator Catherine Corbin, dated April 10, 2008, in the *Tabello* case, arose out of the large number of requests for access received by the City from the same requester with respect to various signs in the City, their status with respect to sign permits, agreements and approvals related to various specific signs, inspection reports with respect to signs, City communications with sign companies, investigations of alleged illegal signs, and other information related to signs.

In that case, the City had taken the position that the request, taken together with the 630 other recent requests by the same requester in that year, was frivolous or vexatious within the meaning of section 5.1(a) of Regulation 823 under MFIPPA.

Councillor Moscoe's position appears to be that since the Information and Privacy Commissioner did not accept the position of the City that to process the applicant's numerous requests would interfere with its operations, this casts doubt on the current system.

Councillor Moscoe concludes that: "This order is extremely relevant to the issue before us in that the entire issue focuses on the right of Councillors to obtain on line access to IBMS which is shrouded in a veil of *interference in the law enforcement process*."

My reading of the *Tabello* decision leads me to conclude that the decision of the Adjudicator in that case is not inconsistent with any of the conclusions in my legal opinion, nor does it cast doubt on them.

Councillor Moscoe's proposal that Council assume the discretionary decision-making powers of the MFIPPA "Head", to the extent that he refers to the *Tabello* case, appears to be based on the assumption that, since the Information and Privacy Commissioner Adjudicator did not accept the City's position in that matter, that indicates a defect in the City's information systems, causing Councillors to be deprived of "information that they require".

My careful review of the Adjudicator's order leads me to conclude that:

- she did not find any error of law or principle in the City's conclusion that the over 630 access requests by the same requester represented a pattern of conduct amounting to an abuse of the right of access and was frivolous and vexatious;

- in fact, the Adjudicator held that "*in terms of the number of requests submitted by a single requester, in my view, it is sufficiently high enough that I find it to be a relevant*

factor weighing in favour of a finding that a pattern of conduct exists that amounts to an abuse of the right of access";

- the Adjudicator suggested, however, that she was "*not persuaded that the relief provided by the Act would not be sufficient to address its concerns in this regard*", referring to cost recovery mechanisms which could be utilized by the City to mitigate or avoid interference with its operations. In other words, the City's position was undermined by the fact that it had not required the requester to pay the full fees permitted under the Act;

- the Adjudicator went on to conclude that "*my finding here is based on the circumstances before me at this time. Should the number or nature of the requests submitted by the Appellant change, the City is not precluded from attempting to demonstrate that the relief provided by the Act is insufficient to address the burden that the requests create and that the Appellant is engaged in a pattern of conduct that would interfere with its operations*";

- in other words, the Adjudicator clearly accepted that the number and nature of the requester's multiple requests could well constitute abuse of the right to access or interfere with the operations of the institution, supporting a conclusion by the Head that a particular request is frivolous or vexatious, but the Adjudicator's judgment call was that the situation in question had not yet reached that point, particularly in view of the City's hesitancy to charge the requester fees authorized under the Act.

While it is desirable that the City continue to improve its facilities for making more information routinely available to the public, this does not change the fact that many of the records subject to IPC Order MO-2289 contain law enforcement information, not only building plans for signs. As a result, had Council been Head at the time of receipt of the bulk request, individual Councillors would have had to play a role in determining the City's response, in the same legal context of MFIPPA, which protects law enforcement information and is intended not to be used with the effect of interfering in the municipal law enforcement process. As with the case of the City's current Head, decisions would have had to have been made in accordance with the law. The personal views and interests of Councillors, if participating in exercising the collective role of the Head, would be similarly constrained.

I would emphasize that the relevant provisions of MFIPPA provide discretionary exemptions from the general rule of disclosure not only with respect to potential interference with a law enforcement matter, but also with respect to the potential disclosure of investigative techniques and enforcement procedures, the disclosure of the identity of informants, information furnished

by a confidential source, and the disclosure of records prepared in the course of law enforcement, inspections or investigations by any law enforcement agency.

"Law enforcement information" may also involve personal information about an identifiable individual, including an individual's address and an individual's name where it appears with other personal information relating to the individual. Section 14(3)(b) of MFIPPA specifically provides that a disclosure of personal information is presumed to constitute an unjustified invasion of personal privacy if the personal information was compiled and is identifiable as part of an investigation into a possible violation of the law, except to the extent that disclosure is necessary to prosecute the violation or to continue the investigation.

Accordingly, I do not understand the relevance of the *Tabello* case to the issues dealt with in my legal opinion letter of April 4, 2008, particularly in view of the fact, as stated therein, that the Councillors to whom I talked during the early stages of the preparation of my report acknowledged that they are not seeking personal information and that they do not have a right to legal access to confidential law enforcement information.

As a result of that decision, the Court has decided that the City must receive and deal with Mr. Tabello's requests, not that it must grant any of them.

In general, it is difficult to see how, if members of Council, or the Council itself, were to exercise the decision-making powers of the Head under MFIPPA, more types of information, or more information, said to be sought by members of Council, would be made available to them.

As with other aspects of municipal government, the relevant legislation creates a statutory framework requiring the same legal principles to be followed, whoever is making the decision to grant or refuse a request for disclosure of information.

As I have discussed above, the great bulk of the records contained in IBMS involves information already available as of right to both members of Council and the public, and a number of decisions, directions and programs are now in place for the purpose of improving public and Councillor access to the information in question.

With respect to other information and records that are not so available, in most circumstances such involve records containing personal information and confidential enforcement information, which are not required in order to enable members of Council to fulfil their legislative roles, and which, it is my understanding, Councillors are not seeking to have disclosed to them in any event.

This returns the issue, once again, to matters of priorities, funding and resources, all within the decision-making powers and responsibilities of the Council under the current regime.

Assuming that Council is to function as the Head in decision-making with respect to individual requests for access, it will have to deal with all such requests, not simply those made by members of the Council itself. The principles underlying rights to access and privacy embodied in MFIPPA are designed to serve the public interest as a whole, and apply equally to both members of municipal councils and other members of the public.

The Act also operates within a context in which, once confidential information has been transmitted, whether to a member of the public or a member of Council, there is no effective way by which its further transmission or use can be controlled.

My conclusion, as set out in my April 4, 2008 opinion letter, is that, generally, members of City Council are not at the present time denied access to information which they require, and to the extent that there is other information to which they are currently denied access, such would be due to the past and current Council decision-making in the context of the requirements of MFIPPA, and not to the fact that the Council has seen fit to delegate the powers or duties of the Head to the City Clerk.

CONCLUSIONS

To summarize, my conclusions are as follows:

(1) I do not believe that it would be feasible or capable of implementation for the Council to take upon itself the powers and duties of the Head for the purposes of the MFIPPA.

(2) Taking into account the number of requests for access received by the City, and the nature of access requests, and especially in the context of the tight timelines imposed by the Act for responding to such requests, it would be inappropriate for the Council, or even a committee of Council, to assume responsibility for adjudicating individual requests for access.

(3) In any event, even if a proposal could be implemented in practice, such would not in itself change the principles inherent in MFIPPA or otherwise enlarge the availability to members of Council of types or amounts of information in the manner apparently sought by Councillor Moscoe.

(4) The nature of decision-making by the Head anticipated by MFIPPA is not an appropriate one for City Council to exercise, particularly since it involves the interpretation and application of legal principles and overseeing the consistent and proper administration

and decision-making in compliance with a statute, not the policy and political decision-making discretionary role normally exercised by an elected council.

(5) In any event, City Council simply does not have enough time to fulfil the complex and time-consuming responsibilities of the Head with respect to the over 100 requests for access to corporate records which the City now receives each week.

RECOMMENDATION

IT IS RECOMMENDED that the City Council not revoke its current delegation to the City Clerk of the powers and duties granted or vested in the Head for the purposes of MFIPPA.

I trust that the foregoing will be of assistance to your Committee.

Yours truly,

WeirFoulds LLP

George H. Rust-D'Eye

GHR/jnb
c. Anna Kinastowski, City Solicitor

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