



**Information and Privacy  
Commissioner/Ontario**  
**Commissaire à l'information  
et à la protection de la vie privée/Ontario**

# **ORDER P-285**

**Appeal 900649**

**Ministry of the Solicitor General**



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O R D E R

BACKGROUND:

On October 3, 1990, the Ministry of the Solicitor General (the "institution") received a request under the Freedom of Information and Protection of Privacy Act, 1987 (the "Act"). The requester indicated that he wished to have access to the following record contained in the Professional Standards Branch of the Ontario Provincial Police in Toronto, Ontario:

Complaint file 253-10-90-0191 [requester's name] including statements, will say, court brief, officers notes, all internal and external correspondence, all letters and memo.

On November 28, 1990, the institution responded to the request in the following manner:

Partial access is granted to information concerning your request. Access is denied to investigative notes, witness and complainant statements, information prepared for use in Police Act hearings, and other personal information which could constitute an unjustified invasion of privacy if disclosed pursuant to subsections 13(1), 14(1) (a), 14(2) (a), 19, 21(1) (f)....

The record totals 1,245 pages and consists of witness statements, investigative notes, and other documents which form part of the institution's investigation file into a complaint by a named individual against the appellant under the Police Act.

The Police Act was repealed on December 31, 1990 and was replaced by the Police Services Act. I am informed by the institution that the proceedings relevant to this appeal are being conducted, by agreement of all parties, under the Police Act.

The appellant was provided with total access to 188 pages of the record, and partial access to an additional 18 pages. The remaining 1,039 pages were not disclosed.

On December 14, 1990, the requester appealed the decision of the institution. Attempts to mediate this appeal were not successful. Accordingly, notice that an inquiry was being conducted to review the decision of the head was sent to the appellant, the institution and 37 persons identified in the record (the "affected persons") on November 14, 1991. Enclosed with each notice was a report prepared by the Appeals Officer, which is intended to assist the parties in making their representations concerning the subject matter of the appeal.

Written representations were received from the appellant, the institution and 18 of the affected persons. I have considered these representations in reaching my decisions in this appeal.

Appendix A has been attached to this Order to help understand the record. This appendix is structured so that reference can be made to the pages of the record for which exemptions have or have not been applied, whether or not disclosure has occurred, and whether or not there are any duplicate pages. With reference to the duplicate pages of the record, the decision I reach on a particular page will be applicable to its duplicate.

The institution's numbering of documents has been used for the purposes of identifying the record.

**ISSUES:**

The issues arising in this appeal are as follows:

- A. Whether the information contained in the record qualifies as "personal information" as defined in section 2(1) of the Act.
- B. If the answer to Issue A in the affirmative, whether the discretionary exemption under section 49(b) of the Act applies to the records.
- C. Whether the record qualifies for exemption under section 13(1) of the Act.
- D. Whether the record qualifies for exemption under sections 14(1) (a) or 14(2) (a) of the Act.
- E. Whether the record qualifies for exemption under section 19 of the Act.
- F. If the answer to Issue A and Issue C, D or E is yes, whether the head has properly exercised discretion under section 49(a) of the Act.

**SUBMISSIONS/CONCLUSIONS:**

**ISSUE A: Whether the information contained in the record at issue qualifies as "personal information" as defined in section 2(1) of the Act.**

Personal information is defined in section 2(1) of the Act, in part, as follows:

"personal information" means recorded information about an identifiable individual, including,

...

(b) information relating to the education or the medical, psychiatric, psychological, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved,

...

(d) the address, telephone number, fingerprints or blood type of the individual,

...

(g) the views or opinions of another individual about the individual, and

(h) the individual's name where it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual;

I have examined the record and, in my view, the following pages contain information which satisfies the requirements of the introductory wording of the definition of "personal information" and/or one or more of the subparagraphs noted above: pages 18, 22-23, 237, 280, 284-285, 290, 716-723, 725-727, 761, 796, 816, 827-828, 840-841, and 849-852 contain the personal information of the appellant only; pages 5-17, 19-21, 24-210, 238-279, 281, 286-289, 291-292, 300-307, 309-313, 321-322, 334, 688-702, 704-715, 728-755, 759, 762-765, 767-794, 797-814, 830-831, 834, 836-837, 845, 847-848, 886-1003, 1005-1007, 1009-1019, 1021-1046 and

1048-1237 contain the personal information of the appellant and other individuals.

**ISSUE B: If the answer to Issue A in the affirmative, whether the discretionary exemption under section 49(b) of the Act applies to the records.**

Under Issue A I found that pages 5-17, 19-21, 24-210, 238-279, 281, 286-289, 291-292, 300-307, 309-313, 321-322, 334, 688-702, 704-715, 728-755, 759, 762-765, 767-794, 797-814, 830-831, 834, 836-837, 845, 847-848, 886-1003, 1005-1007, 1009-1019, 1021-1046 and 1048-1237 contain the personal information of the appellant and other individuals.

Section 47(1) of the Act gives individuals a general right of access to personal information about themselves, which is in the custody or under the control of an institution. However, this right of access is not absolute. Section 49 provides a number of exemptions to this general right of access. One such exemption is found in section 49(b) of the Act, which reads as follows:

A head may refuse to disclose to the individual to whom the information relates personal information,

where the disclosure would constitute an unjustified invasion of another individual's personal privacy;

As has been stated in a number of previous orders, section 49(b) introduces a balancing principle. The head must look at the

information and weigh the requester's right of access to his/her own personal information against other individuals' right to the protection of his/her privacy. If the head determines that the release of the information would constitute an unjustified invasion of the other individual's personal privacy, then section 49(b) gives the head the discretion to deny the requester access to the personal information (Order 37).

Sections 21(2) and (3) of the Act provide guidance in determining whether disclosure of personal information would result in an unjustified invasion of the personal privacy of the individual to whom the information relates. Section 21(3) lists the types of information the disclosure of which is presumed to constitute an unjustified invasion of personal privacy. The institution has specifically relied on section 21(3)(b) of the Act, which provides:

A disclosure of personal information is presumed to constitute an unjustified invasion of personal privacy where the personal information,

was compiled and is identifiable as part of an investigation into a possible violation of law, except to the extent that disclosure is

necessary to prosecute the violation or to continue the investigation;

In my view, all of the above-noted pages, with the exception of pages 310-313 and page 334, were compiled as a part of an investigation into a possible violation of law, namely the Police Act, and I find that disclosure would constitute an unjustified invasion of personal privacy under section 21(3)(b).

Once it has been determined that the requirements for a presumed unjustified invasion of personal privacy under section 21(3)

have been established, I must consider whether any other provisions of the Act come into play to rebut this presumption. Section 21(4) outlines a number of circumstances which, if they exist, could operate to rebut a presumption under section 21(3). In my view, the record at issue in this appeal does not contain information relevant to section 21(4).

The appellant, in his representations, raised the consideration of section 21(2)(d) of the Act, which states:

A head, in determining whether a disclosure of personal information constitutes an unjustified invasion of personal privacy, shall consider all the relevant circumstances, including whether,

the personal information is relevant to a fair determination of rights affecting the person who made the request;

The appellant submits that the proceedings which commenced as a result of the investigation are of considerable importance to his career and life outside the Ontario Provincial Police, and without seeing the written statements given to the Ontario Provincial

Police it is impossible for him to know if there is any evidence that would benefit his case.

The institution submits that section 21(2)(d) is not relevant in the circumstances of this appeal, because procedures available under the Police Act provided the appellant with the right to a fair hearing and an opportunity to respond to the charges against him. The institution submits that disclosure of the



relevant evidence against him would have occurred during the adjudication of the charges, and that this forum gave the appellant "... all the rights necessary to ensure a fair determination of his rights."

I have carefully reviewed and considered the provisions of section 21(2), the record at issue, the representations which have been provided, the appellant's needs and other provisions of the Act which may rebut the presumption of an unjustified invasion of personal privacy. Having done so, I find that the presumption raised by section 21(3)(b) of the Act has not been rebutted.

In the circumstances of this appeal, I am of the opinion that disclosure of the pages of the record outlined at the beginning of the discussion of Issue B, with the exception of pages 310-313 and 334, would constitute an unjustified invasion of the personal privacy of the affected persons and, therefore, qualify for exemption under section 49(b) of the Act.

In reviewing the head's exercise of discretion in favour of refusing to disclose these pages of the record, I have found nothing to indicate that the exercise of discretion was improper, and will not alter it on appeal.

**ISSUE C: Whether the record qualifies for exemption under section 13(1) of the Act.**

The institution submits that section 13(1) applies to pages 305-307 and page 334 of the record. In my discussion of Issue B, I found that pages 305-307 qualify for exemption under section

49(b). Therefore my discussion of section 13(1) will be restricted to page 334.

Section 13(1) of the Act states:

A head may refuse to disclose a record where the disclosure would reveal advice or recommendations of a public servant, any other person employed in the service of an institution or a consultant retained by an institution.

The institution submits that page 334 contains the advice and recommendations of a senior officer of the Ontario Provincial Police to the Director of the Professional Standards Branch of the same police force, and that the advice and recommendations relate to the proceedings brought against the appellant under the Police Act. It further submits that the recommendations were intended to be used as part of the decision making process, and that it is important for members of the Ontario Provincial Police to be free to give advice and recommendations regarding such matters, in order to conduct these types of investigations.

At page 4 of Order 118 former Commissioner Sidney B. Linden stated the following:

In my view, "advice", for the purposes of subsection 13(1) of the Act, must contain more than mere information. Generally speaking, advice pertains to the submission of a suggested course of action, which will ultimately be accepted or rejected by its recipient during the deliberative process.

I have reviewed the information contained in page 334 and I am of the view that its disclosure would reveal advice and/or recommendations of the senior Ontario Provincial Police officer. In my view, this page qualifies for exemption under section

13(1) of the Act, and I find that none of the exceptions listed in section 13(2) apply in the circumstances of this appeal.

**ISSUE D: Whether the record at issue qualifies for exemption under sections 14(1)(a) or 14(2)(a) of the Act.**

The institution submits that section 14(1)(a) applies to all pages of the record, with the exception of pages 309 and 334. In light of my findings under Issues B and C, I will restrict my discussion of section 14(1)(a) to pages 18, 22-23, 237, 280, 284-285, 290, 310-313, 716-723, 725-727, 761, 796, 816, 827-828, 840-841, and 849-852 of the record.

Section 14(1)(a) of the Act states:

A head may refuse to disclose a record where the disclosure could reasonably be expected to,

interfere with a law enforcement matter;

The words "law enforcement" are defined in section 2(1) of the Act as follows:

"law enforcement" means,

- (a) policing,
- (b) investigations or inspections that lead or could lead to proceedings in a court or tribunal if a penalty or sanction could be imposed in those proceedings, and
- (c) the conduct of proceedings referred to in clause (b);

In its representations, the institution states that as a result of a complaint made against the appellant (an employee of the Ontario Provincial Police), an investigation was undertaken by members of the Ontario Provincial Police under the authority of the Police Act.

Following this investigation the appellant was charged with five counts of Discreditable Conduct under section 1(a)(i) of the Code of Offences set out in the Schedule to Regulation 791/80 made under the Police Act, which stated:

Any chief of police, other police officer or constable commits an offence against discipline if he is guilty of,

- (a) DISCREDITABLE CONDUCT, that is to say, if he,
  - (i) acts in a disorderly manner, or in a manner prejudicial to discipline or likely to bring discredit upon the reputation of the police force,

The appellant was found guilty of the offenses and was punished under section 52(8) of Ontario Regulation 791/80. This section defined the penalties which could be imposed on a person who was found guilty of a major offence under section 52 of Ontario Regulation 791/80 as follows:

- (8) A person found guilty of a major offence is liable to,
  - (a) dismissal; or
  - (b) be required to resign, and in default of resigning within seven days, to be summarily dismissed from the Force; or

- (c) reduction in rank or gradation of rank; or
- (d) forfeiture of pay not exceeding five days pay; or
- (e) forfeiture of leave or days off not exceeding twenty days; or
- (f) a reprimand which may be imposed in lieu of or in addition to any other punishment imposed.

I am mindful of the fact that the records under consideration were created in the course of investigating an employment-related complaint concerning the appellant, and that previous Orders have stated that the definition of law enforcement found in section 2(1) of the Act does not generally extend to employment-related disciplinary matters (Orders 157, 170, 182, 192). However, in my view, the circumstances leading to the creation of the record in this appeal are different. The record was created in the course of an investigation of conduct that was "unlawful" in the sense that it constituted an offence against discipline under a regulation. Moreover, on conviction of an offence against discipline, an appeal could be made to the Ontario Police Commission. The Commission, on appeal, had the power to impose a sanction or penalty independently of the Police Commissioner (employer). The Commission constituted, in my view, a "court or tribunal" in the sense intended by subparagraph (b) of the definition of "law enforcement". I am satisfied that the circumstances surrounding the creation of the record can properly be described as a "law enforcement" matter as defined in section 2(1) of the Act.

I must now decide whether the disclosure of the pages of the record identified above could reasonably be expected to result in the harm specified in section 14(1)(a) of the Act, as claimed by the institution.

The pages of the record at issue contain information relating to complainant and witness statements, investigative notes and other documents prepared in the context of the investigation of the appellant's conduct. As stated above, the appellant was found guilty of five offenses. He appealed the conviction under section 52(9) of Ontario Regulation 791/80, which stated:

A person convicted of a major offence may appeal his conviction or the punishment imposed, or both, as confirmed or altered by the Commissioner, to the Commission.

Section 58 of Ontario Regulation 791/80 described the process to be followed in the event that an appeal was filed. It stated, in part:

- (1) In the case of a conviction of an offence, a notice of appeal shall be directed to the chairman of the Commission, setting forth the conviction, the punishment imposed and the grounds on which the appeal is based.
- (2) The notice of appeal shall be served on the Commissioner and the Commission not later than fifteen days after the time the appellant received notice of his conviction and the punishment imposed, as confirmed or altered by the Commissioner.
- ...
- (6) The Commission shall decide an appeal of a conviction of, or the punishment imposed for, a minor offence by holding a hearing de novo, and for such purpose the provisions of this Part that apply to the initial hearing

of a charge apply with necessary modifications to a hearing de novo.

- (7) The Commission shall decide an appeal of a conviction of, or the punishment imposed for, a major offence from the record but the Commission may, in special circumstances, hear such evidence as it considers advisable.

...

- (10) On the hearing of an appeal against a conviction or the punishment imposed, or both, the Commission may,

- (a) dismiss the appeal;
- (b) allow the appeal and quash the conviction and punishment;
- (c) vary the punishment imposed as it considers just;
- (d) affirm the punishment imposed;
- (e) substitute a decision that in its opinion should have been reached; or
- (f) order a new hearing of the charge.

Because an appeal process is in place which, in certain circumstances, could result in the hearing of further evidence by the appeal body (which has as one of its options to order a new hearing), in my view, until the appeal process has been completed, it is not possible to categorically state that the law enforcement matter has been completed. It is also my view that the ability to conduct these proceedings without

interference is vital to the institution's effectiveness in carrying out its responsibilities and mandate.

For this reason, I find that disclosure of these pages of the record, with the exception of pages 310-313, could reasonably be expected to interfere with a law enforcement matter.

The institution submits that section 14(2)(a) applies to pages 5-210, 237-281, 284-292, 300-307, 310-313, 321-322, 334, 910-1003, 1005-1007, 1009-1019, 1021-1046, and 1048-1237 of the record. In light of my findings under Issues A and B and my decision with respect to section 14(1)(a) above, I will restrict my discussion of section 14(2)(a) to pages 310-313 of the record.

Section 14(2)(a) of the Act states:

A head may refuse to disclose a record,

that is a report prepared in the course of law enforcement, inspections or investigations by an agency which has the function of enforcing and regulating compliance with a law;

In Order 200, Commissioner Tom Wright stated:

In my view, in order to qualify for exemption under subsection 14(2)(a) of the Act, a record must satisfy each part of the following three part test:

1. the record must be a report; and
2. the report must have been prepared in the course of law enforcement, inspections or investigations; and



3. the report must have been prepared by an agency which has the function of enforcing and regulating compliance with a law.

The word "report" is not defined in the Act. However, it is my view that in order to satisfy the first part of the test i.e. to be a report, a record must consist of a formal statement or account of the results of the collation and consideration of information. Generally speaking, results would not include mere observations or recordings of fact.

In its representations, the institution states that the information contained in pages 310-313 is an account of the results of an investigation of allegations against the appellant other than those that are the subject of the record at issue in this appeal. The investigation of these allegations was related to the enforcement of the Police Act, and the record was created by a member of the Ontario Provincial Police. I am satisfied that these pages qualify as a report prepared in the course of law enforcement by an agency which has the function of enforcing and regulating compliance with a law, such that all parts of the section 14(2)(a) test have been met with respect to pages 310-313 of the record.

All pages of the record which were subject to a claim for exemption under section 19 of the Act have been found to qualify for exemption under section 14(1)(a), 14(2)(a) or 49(b). Therefore it is not necessary for me to consider Issue E.

**ISSUE F: If the answer to Issue A and Issue C, D, or E is yes, whether the head has properly exercised discretion under section 49(a) of the Act.**

In Issue A, I found all pages of the record contain the personal information of the appellant. In Issue C, I found that page 334

qualifies for exemption under section 13. In Issue D, I found that pages 18, 22-23, 237, 280, 284-285, 290, 716-723, 725-727, 761, 796, 816, 827-828, 840-841 and 849-852 qualify for exemption under section 14(1)(a), and that pages 310-313 qualify for exemption under section 14(2)(a).

Section 49(a) provides an exception to the general rule that a requester has a right of access to his or her personal information in the custody or control of an institution. Section 49(a) states:

A head may refuse to disclose to the individual to whom the information relates personal information,

where section 12, 13, 14, 15, 16, 17, 18, 19, 20 or 22 would apply to the disclosure of that personal information; [Emphasis added.]

Section 49(a) provides the head with the discretion to refuse to disclose to the appellant his own personal information where sections 13 and 14 apply. In any case in which the head has exercised discretion under section 49(a) I look very carefully at the manner in which the head has exercised this discretion. Provided that this discretion has been exercised in accordance with established legal principles, in my view, it should not be disturbed on appeal.

In reviewing the head's exercise of discretion in favour of refusing to disclose these pages of the record, I have found nothing to indicate that the exercise of discretion was improper, and will not alter it on appeal.

**ORDER:**

I uphold the head's decision to deny access to the record at issue.

Original signed by: \_\_\_\_\_  
Tom Mitchinson  
Assistant Commissioner

\_\_\_\_\_ March 27, 1992

**APPENDIX A**

<b>PAGE NUMBER</b>	<b>DUPLICATES</b>	<b>EXEMPTIONS APPLIED</b>	<b>ACCESS DECISION</b>
1-4	351 re: 4	Nil	Disclosed
5-17	339-346 re: 5-12 352-364 re: 5-17	14 (1) (a) 14 (2) (a) 19 49 (a) 49 (b)	Access denied
18	365	14 (1) (a) 14 (2) (a) 19 49 (a)	Access denied
19-21	366-368	14 (1) (a) 14 (2) (a) 19 49 (a) 49 (b)	Access denied
22-23	369-370	14 (1) (a) 14 (2) (a) 19 49 (a)	Access denied
24-210	371-557	14 (1) (a) 14 (2) (a) 19 49 (a) 49 (b)	Access denied
211-236	558-584	Nil	Disclosed
237	585	14 (1) (a) 14 (2) (a) 19 49 (a)	Access denied
238-279	586-627	14 (1) (a) 14 (2) (a) 19 49 (a) 49 (b)	Access denied
280	628	14 (1) (a) 14 (2) (a) 19 49 (a)	Access denied
281	629	14 (1) (a) 14 (2) (a) 19 49 (a) 49 (b)	Access denied
282-283	630-631	Nil	Disclosed

284-285	632-633	14 (1) (a) 14 (2) (a) 19 49 (a)	284 partially disclosed. Access denied to the remainder
286-289	634-637	14 (1) (a) 14 (2) (a) 19 49 (a) 49 (b)	Access denied
290	638	14 (1) (a) 14 (2) (a) 19 49 (a)	Access denied
291-292	639-640	14 (1) (a) 14 (2) (a) 19 49 (a) 49 (b)	Access denied
293-299	641-647	Nil	Disclosed
300-304	648-652	14 (1) (a) 14 (2) (a) 19 21 (1)	Access denied
305-307	314-316 348-350	13 (1) 14 (1) (a) 14 (2) (a) 49 (a) 49 (b)	Access denied
308	Nil	Nil	Disclosed
309	Nil	21 (1)	Access denied
310-313	Nil	14 (1) (a) 14 (2) (a) 49 (a) 49 (b)	Access denied
317-320	Nil	Nil	Disclosed
321-322	332-333	14 (1) (a) 14 (2) (a) 49 (a) 49 (b)	Access denied
323-331	329 re: 328	Nil	Disclosed
334	336	13 (1) 14 (2) (a) 49 (a) 49 (b)	Access denied
335, 337-338, 347, 351, 653-687	Nil	Nil	Disclosed
688-689	Nil	14 (1) (a) 19 49 (a) 49 (b)	Access denied

690-700	Nil	14 (1) (a) 19 21 (1)	Access denied
701-702	Nil	14 (1) (a) 19 49 (a) 49 (b)	Access denied
703	Nil	Nil	Disclosed
704-715	Nil	14 (1) (a) 19 49 (a) 49 (b)	Access denied
716-723	Nil	14 (1) (a) 19	Access denied
724	Nil	Nil	Disclosed
725-727	Nil	14 (1) (a) 19	Access denied
728-739	Nil	14 (1) (a) 19 49 (a) 49 (b)	Access denied
740	Nil	14 (1) (a) 19 21 (1)	Access denied
741-743	Nil	14 (1) (a) 19 49 (a) 49 (b)	Access denied
744-745	Nil	14 (1) (a) 19 21 (1)	Access denied
746	Nil	14 (1) (a) 19 49 (a) 49 (b)	Access denied
747-749	Nil	14 (1) (a) 19 21 (1)	Access denied
750	Nil	14 (1) (a) 19 49 (a) 49 (b)	Access denied
751	Nil	14 (1) (a) 19 21 (1)	Access denied
752-755	Nil	14 (1) (a) 19 49 (a) 49 (b)	Access denied
756-758	Nil	Nil	Disclosed
759	Nil	14 (1) (a) 19 49 (a) 49 (b)	Partially disclosed
760	Nil	Nil	Disclosed
761	Nil	14 (1) (a) 19 49 (a)	Access denied

762-765	Nil	14 (1) (a) 19 49 (a) 49 (b)	762 and 765 partially disclosed. Access denied to the remainder
766	Nil	Nil	Disclosed
767	Nil	14 (1) (a) 19 49 (a) 49 (b)	Partially disclosed
768-769	Nil	14 (1) (a) 19 21 (1)	Access denied
770-774	Nil	14 (1) (a) 19 49 (a) 49 (b)	Access denied
775-778	Nil	14 (1) (a) 19 21 (1)	Access denied
779-783	Nil	14 (1) (a) 19 49 (a) 49 (b)	Access denied
784	Nil	14 (1) (a) 19 21 (1)	Access denied
785-788	Nil	14 (1) (a) 19 49 (a) 49 (b)	785, 787 and 788 partially disclosed. Access denied to the remainder
789	Nil	14 (1) (a) 19 21 (1)	Access denied
790-794	Nil	14 (1) (a) 19 49 (a) 49 (b)	Access denied
795	Nil	Not responsive	Access denied
796	Nil	14 (1) (a) 19 49 (a)	Access denied
797-814	Nil	14 (1) (a) 19 49 (a) 49 (b)	Access denied
815	Nil	Nil	Disclosed
815A	Nil	Not responsive	Access denied
816	Nil	14 (1) (a) 19 49 (a)	Access denied

817	Nil	Not responsive	Access denied
818-822	Nil	Nil	Disclosed
823-826	Nil	Not responsive	Access denied
827-828	Nil	14 (1) (a) 19 49 (a)	827 partially disclosed. Access denied to the remainder
829	Nil	Not responsive	Access denied
830-831	Nil	14 (1) (a) 19 49 (a) 49 (b)	Access denied
832-833	Nil	Not responsive	833 partially disclosed. Access denied to the remainder
834	Nil	14 (1) (a) 19 49 (a) 49 (b)	Access denied
835	Nil	Not responsive	Access denied
836-837	Nil	14 (1) (a) 19 49 (a) 49 (b)	Access denied
838-839	Nil	Not responsive	Access denied
840-841	Nil	14 (1) (a) 19 49 (a)	841 partially disclosed. Access denied to the remainder
842-843	Nil	Nil	Disclosed
844	Nil	Not responsive	Access denied
845	Nil	14 (1) (a) 19 49 (a) 49 (b)	Access denied
846	Nil	Not responsive	Access denied
847-848	Nil	14 (1) (a) 19 49 (a) 49 (b)	Access denied
849-852	Nil	14 (1) (a) 19	Access denied
853	854, 855, 856 and 857	Nil	Disclosed



858-859	Nil	Nil	Disclosed
860	861, 862, 863 and 864	Nil	Disclosed
865	Nil	Nil	Disclosed
866	867, 868, 869 and 870	Nil	Disclosed
871-872	Nil	Nil	Disclosed
873	874, 875, 876 and 877	Nil	Disclosed
878-879	Nil	Nil	Disclosed
880	881, 882, 883 and 884	Nil	Disclosed
885	Nil	Nil	Disclosed
886-909	Nil	14(1)(a) 21(1)	Access denied
910-1003	Nil	14(1)(a) 14(2)(a) 19 49(a) 49(b)	Access denied
1004	Nil	Nil	Disclosed
1005-1007	Nil	14(1)(a) 14(2)(a) 19 49(a) 49(b)	Access denied
1008	Nil	Nil	Disclosed
1009-1019	Nil	14(1)(a) 14(2)(a) 19 49(a) 49(b)	Access denied
1020	Nil	Nil	Disclosed
1021-1046	Nil	14(1)(a) 14(2)(a) 19 49(a) 49(b)	Access denied
1047	Nil	Nil	Disclosed
1048-1237	Nil	14(1)(a) 14(2)(a) 19 49(a) 49(b)	Access denied
1238-1244	Nil	Nil	Disclosed