Annual **Report**

for the period **January 1, 1999 to October 1, 2000**

Nova Scotia Freedom of Information and Protection of Privacy Review Office

October 26, 2000

The Honourable Murray Scott
Speaker
The Legislative Assembly
Province of Nova Scotia

Sir:

In accordance with section 33(7) of the Nova Scotia Freedom of Information and Protection of Privacy Act, I am pleased to present to you, and through you to the Members of the Legislative Assembly, the first annual report of the Review Officer.

The report covers the period January 1, 1999 to October 1, 2000.

Respectfully submitted,

Darce Fardy
Review Officer

"This Act is an important part of the ongoing process of improving the democratic process in this Province. The past decisions of this jurisdiction and other jurisdictions have supported the basic purpose of this legislation, to provide protection to certain specified information that deserves privacy, and then to ensure the public has the information necessary to make an informed assessment of the performance of its government institutions." Mr. Justice J. Kelly, Atlantic Highways Corp. v. N.S. (1997), 162 N.S.R. (2d) 27(SC)

INTRODUCTION

I welcome this opportunity to present the Review Officer's first annual report to the legislature.

The Review Officer is an ombudsman who reviews decisions that public bodies make when asked for access to records. The Review Officer may make recommendations to public bodies following the review. The Review Officer is appointed by Order-in-Council for a term of not less than five years or more than seven. Although not appointed by a vote of the legislature, the Review Officer can be removed from office by the Governor-in-Council only following a House of Assembly resolution carried by a vote of the majority of the members of the House.

In 1977 Nova Scotia became the first province to pass access to information legislation. Access legislation now exists in every Canadian province and territory, except Prince Edward Island, as well as at the federal level.

A new Act, passed by the legislature in 1993, created the Review Office. Until July 1, 1994, when the new Freedom of Information and Protection of Privacy (FOIPOP) Act came into effect, the only avenue for appeals of decisions of public bodies with respect to applications was to the Nova Scotia Supreme Court. By Order-in-Council a Review Officer was appointed as a part-time member of the Utility and Review Board to accept and report on appeals from people who feel they have been denied their rights under the FOIPOP Act. As welcome as the creation of the review process was to Nova Scotians, no further improvements to the legislation or to the resources and status of the Review Officer were made until 1998 and 1999.

On March 1, 1996, an advisory committee set up in accordance with the Act to review the legislation issued a report with 64 recommendations. Some of these were addressed by the legislature in 1998 and more in 1999.

In 1995, the Review Officer, working alone with some clerical assistance from the UARB, processed 54 appeals. This number nearly doubled in 1996 and, since then, an average of more than two requests a week have been received. Neither the government of the day nor the Review Officer anticipated this increase. On my appointment, it was suggested the job would require the Review Officer to work a week a month to review decisions and write reports, but the Review Officer soon became a part-time employee working five or six days a week.

Legislation passed in November 1999 changed the status of the part-time Review Officer, who had been appointed to consecutive one-year terms, to that of a full-time Review Officer with a five-year appointment. The office has been funded to allow for the hiring of two employees, an investigator/mediator and a case review analyst.

The funding for staff met a need that became urgent when municipalities became subject to the access and privacy legislation in November 1999 under legislation passed the year before. The new Municipal Government Act reflected this change, with legislation similar to the Freedom of Information and Protection of Privacy Act.

Other important amendments were passed in November 1999. Hospitals were brought under the umbrella of access and privacy legislation effective the date of Royal Assent of the Act. Universities, school boards, and colleges were given a year to prepare. They will be subject to the Act as of November 23, 2000.

The Review Office is no longer associated with the Utilities and Review Board, except for the use of its administrative unit, to which the Review Office contributes financial support. This sensible money-saving arrangement is working to our satisfaction. We are grateful for the Board chair's cooperation. Early this year the Review Office relocated to 1660 Hollis Street in Halifax.

The Review Office is setting up a website.

This Act "should be construed liberally in light of its stated purpose…to provide for the disclosure of all government information with necessary exemptions which are limited and specific....doubt ought to be resolved in favour of disclosure." Madame Justice E. Roscoe, McLaughlin v. Halifax-Dartmouth Bridge Commission (1993), 125 N.S.R. (2d) (SC)

REVIEW OFFICER'S MESSAGE

The Review Office is a frugal operation but I am satisfied that it can handle its current work load efficiently and expeditiously on a modest budget.

I commend the government and the Legislature for the important changes extending the legislation's coverage and confirming the independence of the Review Office. It accomplished this by approving the change in status of the Review Officer to full time with a five-year appointment and by obliging the Governor-in-Council to seek a resolution carried by a majority of the House before removing the Review Officer from office. However, review officers are not supposed to be satisfied. This annual report will recommend other changes which I believe will enhance citizens' rights to access to information and to the protection of their privacy.

For the most part I have found the people appointed by government departments and agencies to receive and respond to applications for information to be agreeable, cooperative and supportive of the legislation. They have taken seriously the intent of the legislation to ensure that public bodies are fully accountable to the public by providing the right of access to records and the right of access to, and correction of, personal information about applicants. For many FOIPOP administrators, it is an additional assignment. Among some of them there is the feeling of a lack of support from those above them in the organization.

I am under no illusions that this legislation has been welcomed by all senior government officials. In fact I have a growing concern that some within government regard applicants, and perhaps the Review Officer, as adversaries or, at best, nuisances. There is some evidence that there are those who, on receiving applications for access, look first for ways to prevent disclosure. Instead of asking the question "Why not disclose?" as the act expects, they first ask themselves, "Why disclose?" It would be unfortunate if this attitude spread. It does not respect the spirit of the

Act and it undermines the cooperation and goodwill on which the review process depends. In my view, those who take that approach are not acting in accordance with the legislation or with the views of the Nova Scotia Supreme Court.

In some cases my letters and e-mails to departments go unacknowledged and have been, at times, ignored.

Some government departments appear to delay, deliberately, their decisions until the 30-day time limit is about to expire. I remind them that the Act expects a public body to make a decision on an application within 30 days and without delay.

Too often, public bodies put little vigour into their representations to the Review Officer in support of their decisions. In fairness to the process, the Review Officer needs clear and well-thought out arguments from public bodies to assist him in reaching conclusions. While some departments consistently do exactly that, others make cursory representations to me.

With cooperation, I hope to resolve these problems. In my next annual report I will identify the departments, municipalities, and local public bodies that I believe are not living up to their obligations under the acts.

It would help if deputy ministers reaffirmed the government's commitment to this legislation in a staff communication and encouraged their FOIPOP administrators. This will comfort the administrators and, hopefully, interrupt any further shift from the principles of the legislation.

I recognize that this legislation has added to the workload of ministers and senior officials but I take the government at its word that the latest amendments to the Act represent its commitment to open its doors wider to public scrutiny.

OUTSIDE ACTIVITIES OF REVIEW OFFICER

In 1999 our small office (two people at that time) hosted the annual meeting of the Information and Privacy Commissioners of Canada. Some 12 commissioners and their deputies spent two days in Halifax. This small office has reaped considerable benefit and support from these meetings.

Last fall I was invited to appear on a panel at the annual COGEL (Council on Government Ethics Law) Conference in Rhode Island to speak on the effectiveness of a small Review Office in promoting open government and accountability.

I participated in a panel discussion with the Federal Information Commissioner at the Canadian Association of Journalists' annual conference in Halifax in April 2000 to discuss the topic How Free are our Freedom of Information Laws?

During the past 12 months I met with representatives of municipalities, including police, and with universities and school boards to explain the review process and the importance these new public bodies should attach to the training of their FOIPOP administrators. I urged them to remember the admonition found in section 7 of the Provincial Act and section 467 of the Municipal Act to help the applicants and to meet the time limits.

> *"(A)ll exemptions to access must be limited and specific. This means that where there are two interpretations open to the court, it must, given Parliament's stated intentions, choose the one that infringes on the public's right to know the least... It follows that an interpretation of an exemption that allows the government to withhold information from public scrutiny weakens the stated purpose of the Act." Mr. Justice MacDonald, Federal Court, Rubin v Canada (Minister of Transport) (Federal Court of Appeal) (A-70-96)*

Mediation

Section 35 of the Act allows the Review Officer to attempt to settle matters under review by mediation. In the past the shortage of staff coupled with the workload prevented extensive mediation attempts.

However, having recognized its importance, the Review Office has added a mediator/investigator. It is her responsibility to review requests as they arrive in the office and to begin efforts to reach a resolution through the mediation process. This position was established only a few months ago so it is impossible at this time to measure the effectiveness of our mediation efforts. Mediation may be more effective where Information Commissioners (Review Officers) have order powers, as they do in some provinces, but I am hopeful that applicants and public bodies alike will see the advantages in mediated settlements.

> *"To try to restore the privacy that was universal in the 1970s is to chase a chimera. Computer technology is developing so rapidly that it is hard to predict how it will be applied but some of the trends are unmistakable. The volume of data recorded about people will continue to expand dramatically. Disputes about privacy will become more bitter. Attempts to restrain the surveillance society through new laws will intensify.*
>
> *Yet here is a bold prediction: all these efforts to hold back the tide of electronic intrusion into privacy will fail..." (The Economist)*

Protection of Privacy

More and more Canadians, including Nova Scotians, are recognizing threats to their privacy in this time of technological change. They wonder how private are their health records, their financial records, their social benefits records and even, in fact, their lifestyles. Discomforting stories from across the country, most recently in Ontario and Manitoba, about the misuse and/or misplacement of peoples' personal information, information that citizens had every expectation would be kept private, have alerted Canadians to the need for better privacy protection.

Parliament recently passed legislation protecting Canadians' privacy rights in the private sector. This law regulates commercial uses of personal information. It comes into effect in January 2001. In January 2002, the Act will apply to personal health information and, in January 2004, it will apply in the provinces.

Nova Scotia's legislation lays down rules for the use and collection of personal information. A major weakness needs correction. The Review Officer has no powers to investigate privacy complaints except those related to access to documents containing personal information. I have already approached government suggesting an amendment to the legislation to provide the Review Officer with these powers.

"(T)he erosion of privacy, in fact, is one of the most worrying features of the revolution in electronic communications."(The Winnipeg Free Press)

"Privacy is becoming a number one concern for Canadians." (The Globe and Mail)

"(L)ittle if any kind of privacy protection exists in the Atlantic Provinces." (Report of the House of Commons Standing Committee on Human Rights and the Status of Persons with Disabilities, April 1997)

VEXATIOUS, MISCHIEVOUS OR FRIVOLOUS APPLICATIONS

Fortunately, all but a few Nova Scotians who use the Act do so responsibly. The Ontario Freedom of Information and Protection of Privacy Act permits the head of a public body to refuse an application for access if it is of the opinion, on reasonable grounds, that the application for access is frivolous or vexatious. The regulations under that Act prescribe certain standards as to what constitutes reasonable grounds for such a refusal. A public body must set out in its decision its reasons for determining whether an application is frivolous or vexatious and an applicant may apply to the Information Commissioner for a review of the decision. I'll be proposing a legislative amendment with respect to this. Care must be taken that this amendment not be abused.

PUBLIC SUPPORT FOR ACCESS AND PRIVACY LEGISLATION

Although more and more Nova Scotians are using the Act (see accompanying charts), there is little of the public support found in other provinces where citizens' groups, academics and others lend their support to and encourage improvements in access and privacy legislation. They have become community watchdogs. I hope that Nova Scotians will be attracted to support this legislation.

The Review Officer, unlike other Information and Privacy Commissioners, has no mandate under the act to promote the legislation. In my recommendations, I will ask for the formal legislative authority to conduct public information sessions.

RECOMMENDED CHANGES TO THE LEGISLATION

The changes that I propose appear in other access and privacy legislation in the country:

This Act provides the Review Officer with what I describe as reactive powers. With respect, I propose the legislation be amended to allow the Review Officer, where there are reasonable grounds, to investigate and audit public bodies to ensure compliance with the Act.

The Act is silent on the handling of privacy complaints. I propose the Review Officer be given the power to receive and investigate privacy complaints and to issue a report.

I propose the Act provide the Review Officer with the power to comment on proposed access and privacy legislation.

The amendments to the legislation respecting the independence of the Review Officer should be seen as a first step towards another amendment making the Review Officer an Officer of the House. The Review Office should have the same standing as the Ombudsman's Office. The Review Office should become a commission.

Despite the sensitivity of the material handled by the Review Officer and the staff of the office, the Act does not provide for an oath of confidentiality for the Review Officer or staff. Steps should be taken to correct this.

The Act offers no protection for the Review Officer, or any person working under the direction of the Review Officer, against criminal or civil proceedings for anything reported or said in good faith in the exercise of their duties. I recommend the Act be amended to rectify this.

I recommend an amendment to the Act to allow a public body to deny an application when, on reasonable grounds, it determines an application to be frivolous or vexatious. Such a decision would be open to review by the Review Officer.

I propose an amendment providing the Review Officer with the formal authority to inform the public. This first annual report is a start. I have been invited, and have accepted, invitations to speak to classes at the King's College Journalism School and at community colleges. I have done this without the specific legislative authority to do so.

There is some confusion over whether a public servant should receive third party notice. Section 20(4)(e) suggests she/he is entitled to notice while the Act, in section 3(m), excludes a public body from any third party relationship. I propose this be clarified in the legislation.

I recommend an amendment to section 47 to make it an offence to mislead the Review Officer and that the same penalty be imposed as for the offence of misleading an applicant.

SUMMARIES OF SELECTED REVIEWS

Because this is my first annual report I will summarize interesting reviews over the past few years.

Public Prosecution Service Misleads Review Officer and its FOIPOP Administrator
Review Officer's Report No. FI-97-38

In June 1997, an applicant asked the Public Prosecution Service (PPS) for a copy of a report he had been told was being prepared on the Westray Mine disaster prosecution. PPS denied access giving, as a reason, that the report related to incomplete prosecutions [s.4(1)(2)(i)]. Under section 38 I exercised my powers to request a copy of the report. I was told by PPS that no report existed for me to review. From then until June 1998 I checked regularly with PPS and was told each time that the report was still a work in progress. On June 30, 1998, a PPS prosecution team, after announcing the stay of two prosecutions, released a Westray History/ Chronology, which included references to six internal Westray reports that had been provided to the Director of PPS between May 1997 and June 1998. The Service's freedom of information administrator said she learned of the completed reports at the same time I did. In a letter to me she said she had been misled by her own organization. In my conclusions I said I had been misled by evasive responses from PPS. In my recommendations I urged PPS to organize information and training seminars for staff; to ensure in the future that the FOIPOP administrator is kept fully informed while dealing with applications for access; and to proceed with dispatch to deal with the application. I learned in August 2000 that 98 per cent of PPS staff have now been trained and that the administrator is now kept fully informed while dealing with freedom of information applications.

The reports and other relevant information were released, with no apparent harm done. The number of appeals of PPS decisions has been reduced considerably. The same FOIPOP administrator is on the job.

The management of PPS and its freedom of information administrator are to be commended. This shows that a sea change in approach is possible.

Disclosure of Some Personal Information Is Not an Unreasonable Invasion of Privacy. Report No. FI-98-55.

The Western Regional Hospital Board made public a summary of a report commissioned after the Board noted a number of serious deficiencies at the Yarmouth Regional Hospital. An applicant asked for a copy of the entire report and was refused. The solicitor representing a third party, a person dismissed from his position at the hospital, argued that the report should not be disclosed because it was "subject to covenants of confidentiality between the parties to (an) action." I concluded that, on such a serious issue, the board had to show accountability to the public by disclosing the entire report after some severing of personal information. I expressed the view that the hospital board which admitted "an unacceptable lack of standards" at the hospital could reassure citizens only by disclosing the report. The need for that reassurance outweighed the concerns of the third party. The board agreed with my recommendation and disclosed the report.

The First Request for Review Concerning a Public-Private-Partnership Contract: Report No. FI-96-46

In 1996, the government decided to build the first public-private toll highway in the country. The Department of Transportation and Public Works agreed, as was appropriate, to make the contract public. A solicitor for the construction company, the Atlantic Highways Corporation, asked, as a third party under the Act, for a review of the decision of the department to release the contract. It argued that the contract was exempt under section 21(1), which protects the commercial and financial interests of third parties when certain conditions are met. I concluded that section 21 did not support the third party's arguments. I also concluded that disclosing such contracts is necessary if a government department is to fulfill its obligations to be accountable to the public and recommended that a copy of the contract be provided to the applicant. In my report I said that a company doing business with the government is doing business with the taxpayers and cannot expect the details of such a contract to remain confidential. The corporation appealed to the Nova Scotia Supreme Court, which also concluded that the corporation had not shown proof that disclosing the contract would reveal trade secrets or commercial information belonging to the

corporation. The Court ordered its release. All government requests for proposals now carry the notice that the contents of a contract are subject to this Act. Private companies with government contracts now appear to be living more comfortably with the Act.

Review with Respect to Report Following an Investigation into Accusations of Abuse at Nova Scotia's Youth Training Centres: Reports Nos. FI-99-37, FI-00-29

Over the past several years, the Review Officer has been asked to review decisions of the Department of Justice with respect to records of investigations into accusations of abuse at the province's youth training centres, particularly at the Shelburne Youth Centre (SYC). In FI-99-37, at the request of an applicant, I reviewed a decision by the department to deny access to a copy of a report prepared during an investigation of complaints against him by the department's Internal Investigation Unit (IIU). The applicant had also been denied access to an IIU Report completed after a general investigation of the accusations. The department cited exemptions under "harm to law enforcement" and "protection of personal privacy" provisions. After representations from the department and the RCMP, I concluded there was not enough evidence to support the claim that disclosure would harm law enforcement; and that the reports could be severed of information that would constitute "an unreasonable invasion of a third party's privacy."

A related request for review from a journalist (FI-00-29) concerned the department's decision to deny access to particular sections of the IIU report. This applicant avoided asking for those sections containing personal information. This application was also denied under the "protection of privacy" and "harm to law enforcement" exemptions. I concluded that the applicant should be provided with the sections of the report he asked for after names were severed.

In its response to my recommendations with respect to FI-00-29, and later to FI-99-37 and four other similar appeals, the department cited an exception, section 4(2)(i), it had not cited during the review. Under that section, a record relating to an ongoing prosecution is not subject to this Act. The applicant asked me to investigate the behaviour of the department in claiming an exception after the review had been completed. (See Investigations, below.)

The department subsequently indicated it would accept the Review Officer's recommendations after first seeking guidance from the Nova Scotia Supreme Court. The Court declined to give any instructions or lay

down any restrictions with respect to the IIU report. The same day the department informed applicants and the Review Officer it would follow his recommendations immediately.

Are the Legal Expenses of Counsels Appointed to Two Westray Mine Managers Protected under the Solicitor-Client Exemption of the Act? FI-98-87

An applicant asked the Department of Justice for information with respect to the legal fees and expenses of the two lawyers appointed to represent two men who were managers of the Westray Mine at the time of the underground explosion. In March 1997, the Supreme Court of Canada ordered the government of Nova Scotia to pay the legal fees of the two mine managers charged in connection with the mine collapse. The department determined it would take on that responsibility and appointed independent private lawyers to act as arbiters to scrutinize, on behalf of the department, the fees and disbursements made to lawyers representing the managers. The mine managers' lawyers were notified of the application, as third parties, in accordance with section 22 of the Act. One of the lawyers objected to disclosure, the other didn't. The lawyer who objected maintained that any representations he made to the department's lawyers were privileged. One of the lawyer/arbiters also objected to disclosure.
The department cited case law to support its position that legal fees enjoy privilege. I concluded that this case was different from the ones involved in the court cases cited. I determined that communications between the mine managers' lawyers and the arbiter/lawyers were not made for the purpose of receiving legal advice and were, therefore, not privileged. I recommended disclosure. The department rejected my recommendations. The applicant appealed to the Supreme Court and the Court ruled the information sought was not privileged.

INVESTIGATIONS

I have completed two investigations of the actions of public bodies with respect to applications for access.

An investigation into actions taken by the Sydney Steel Corporation in response to an application. (FI-99-46)

After completing a review of a decision by the Sydney Steel Corporation with respect to an application for access to documents (FI-00-21, April 28, 1999), the applicant asked that I investigate the corporation's actions during the review.

The issue surrounded Sysco's distinction between a "management plan" and a "business plan." The applicant had asked for, among other documents, a copy of the corporation's management plan. He was told there were no documents related to a management plan.

During reviews, public bodies are asked to provide the Review Officer with copies of all documents relevant to the application. In this case, Sysco said that a "Memorandum of Understanding" and a "Payment Agreement" were the only documents in its possession relevant to the application.

After hearing references to a business plan during my review, I asked Sysco to reaffirm that I had been provided with all relevant documents. Sysco did so. But it added that the applicant had not asked for the business plan and therefore it was not relevant to the application. The applicant said that although he had not mentioned the business plan specifically, he felt his request for a management plan covered it.

When the business plan was tabled in the Legislature, I concluded that it dealt specifically with the management of Sysco and was a document relevant to the application. I reminded Sysco that the Review Officer must be able to review a decision to categorize a document as not relevant to the application. Otherwise, a document could be declared irrelevant by a public body and put outside the reach of the Review Officer, who would be denied an opportunity to confirm or deny its relevance.

I also concluded that any misunderstanding about what the applicant wanted could have been cleared up by a phone call.

Investigation into the Decision of the Department of Justice to Cite an Exception After a Review Had Been Completed. (August 24, 2000)

This request for an investigation resulted from a decision by the Department of Justice with respect to a recommendation I made in Report FI-00-29 on July 6, 2000 (referred to above). In this case the department raised an exception after the review was completed.

Public bodies are expected, when responding to an application, and during any subsequent review, to raise all the exemptions and exceptions on which they based their decisions. This provides an applicant with an opportunity to respond and the Review Officer with an opportunity to consider it.

The section cited was section 4(2)(i), which reads that records related to a prosecution not yet completed are not subject to the Act. The case referred to by the department involved the prosecution of a former government youth probation officer. The lawyer for the accused had initiated a stay of proceedings. This occurred a month before the department made written and oral representations to the review.

Without arguing the merits of that exception in this case, I concluded that the department should have known of this ongoing prosecution. I also concluded that by taking this decision to cite an exception after a review is completed, the department harmed the review process. I reminded the department that the successful implementation of this Act depends on the cooperation and goodwill of all parties.

In this report I cited two federal court cases that supported my view that exemptions or exceptions cannot be introduced after a review has been completed.

The department reacted appropriately to my comments.

The Review Officer's reviews can be found in the Legislative Library and in QuickLaw.

Staff of the Review Office:

Review Officer:	Darce Fardy
Mediator/Investigator:	Susan Woolway
Case Review Analyst:	Lynn Prime

1999 Statistics

Appeals Each Year

1995	54
1996	86
1997	102
1998	122
1999	116

It takes, on average, 1.9 months to do a review.

Reviews

Private citizens	71
Journalists	29
Politicians	11
Organizations	5

Issues

Time extension	8
Refusal to disclose	78
Adequate search/no records exist	7
3rd party review	2
Fee waiver	8
No response/ handling of request	12
Not a public body	1

Recommendation Status

Recommendations accepted	31
Partial acceptance	8
Recommendations rejected	6
Reviews mediated	4
Reviews withdrawn	3
Public body decisions supported	57
Other (incomplete or waiting for decision)	7

Reviews Broken Down by Department

Public Prosecution Service	8
Department of Finance	3
Executive Council	2
Natural Resources	5
Agriculture and Marketing	1
Human Resources	2
Environment	9
Health	5
Nova Scotia Gaming Corp.	3
Education	7
Nova Scotia Securities Commission	2
Cosmetology Association	1
Housing and Municipal Affairs	9
Police Commission	1
Transportation and Public Works	3
Justice	15
Economic Development	10
Community Services	13
Business and Consumer Services	5
Regional Police	3
Sydney Steel Corporation	1
Technology and Science Secretariat	2
Labour	1
Human Rights Commission	1
Emergency Measures Organization	1
Nova Scotia Archives	1
Town of Middleton	1

2000 Statistics

Appeals Each Year

1995	54
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1999	116
2000	86 (as of Sept 27/00)

It takes, on average, 1.9 months to do a review.

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Fee waiver	6
No response/ handling of request	5
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Recommendation Status

Recommendations accepted	16
Partial acceptance	4
Recommendations rejected	3
Reviews mediated	2
Reviews withdrawn	4
Public body decisions supported	23
Other (incomplete or waiting for decision)	34

Reviews Broken Down by Department

Aboriginal Affairs	1
Priorities and Planning Secretariat	4
Housing and Municipal Affairs	2
Justice	11
Health	5
Community Services	8
Education	7
Finance	3
Technology and Science Secretariat	1
Town of Mulgrave	1
Nova Scotia Gaming Corporation	2
Executive Council	7
Nova Scotia Legal Aid	1
Petroleum Directorate	2
Truro Police	2
Pictou Municipality	1
Business and Consumer Services	2
Human Rights Commission	1
Economic Development	2
Natural Resources	1
Transportation	4
Halifax Regional Municipality	4
Labour	1
Town of Wolfville	1
Office of Premier	2
Human Resources	2
QEII Health Sciences Centre	1
Fisheries and Aquaculture	1
Environment	2
Public Prosecution Service	1
Cape Breton Regional Municipality	1
Halifax Regional Police	1
Nova Scotia Archives	1