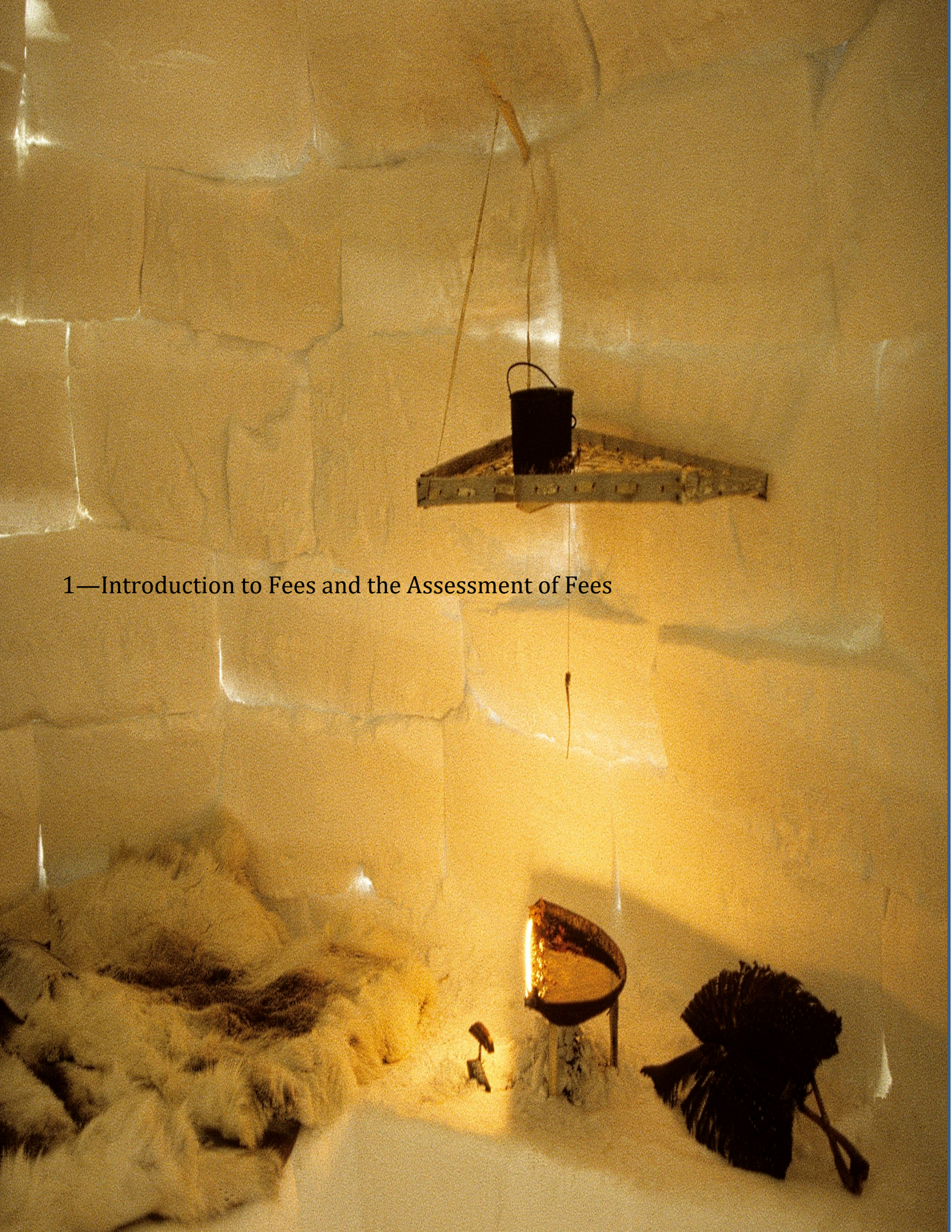


Table of Contents

1 – Introduction to Fees and the Assessment of Additional Fees	3
1.1 About the ATIPP Manuals	4
1.2 Definitions	4
1.3 Fees Authorized by Legislation	6
1.4 Application Fee	6
1.5 Personal versus General Information	7
1.6 Additional Fees	9
1.7 Calculating and Tracking Time	10
1.8 Final Invoice	10
2 – A Breakdown of the Fee Schedule	12
2.1 Introduction	13
2.2 The Fee Schedule Explained	13
3 – Waiver of Fees	16
3.1 Introduction	17
3.2 Delegation of Authority for Fee Waiver	17
3.3 When to Consider a Fee Waiver	17
3.4 Consideration of Public Interest	18

The image shows the interior of an igloo, which is a dome-shaped structure made of ice blocks. The walls are composed of large, rectangular ice blocks with visible joints. A hanging lamp, consisting of a metal tray with a small pot on top, is suspended from the ceiling by a rope. In the lower right, a fire lamp is lit, casting a warm glow. A dark, fan-shaped object, possibly a hat or a piece of clothing, is on the floor. The overall atmosphere is dimly lit and cozy.

1—Introduction to Fees and the Assessment of Fees

1.1 About the ATIPP Manuals

This manual is part 4 of a 4-part comprehensive guide on the *Access to Information and Protection of Privacy (ATIPP) Act* and Regulations for processing Access for Information requests. These manuals are meant to provide clarity, direction and practical examples to help you understand the *ATIPP Act*, however it is not meant to replace the *ATIPP Act* as a reference for ATIPP requests. All ATIPP Coordinators are expected to be familiar with the *ATIPP Act* and its provisions.

Part 1 covers the foundations of the *ATIPP Act*, the people and organizations involved in the ATIPP process, and the request process in general. Part 2 covers exemptions listed under the *Act* and how to apply them, part 3 covers the Information and Privacy Commissioner and how they are involved in the ATIPP process, and part 4 covers the assessment of fees for ATIPP requests.

However, these manuals do not cover issues related to protecting privacy outside of ATIPP requests, such as privacy breaches or how to do Privacy Impact Assessments. For these and other privacy issues, please see the Privacy Management Manual document. These manuals also don't deal with information that is outside of the scope of the *ATIPP Act*, such as court records or legislative assembly records.

If you are looking for a short, step-by-step guide to processing an ATIPP request, please see the *ATIPP Processing Guidelines*. For other ATIPP-related documents, please see the ATIPP Intranet page or the *Access to Information and Protection of Privacy* folder on the V-drive.

1.2 Definitions

There are many terms and acronyms surrounding the *ATIPP Act* and ATIPP requests. These are some of the most frequently used ones:

- *Applicant*: The person or organization that is making an ATIPP request.
- *ATIPP Act* (or the 'Act'): Nunavut's *Access to Information and Protection of Privacy Act*. The law that states that people have access to information held by the Government of Nunavut and other public bodies, and lays out how privacy must be protected. This is sometimes referred to as "*ATIPPA*".
- *ATIPP Coordinator*: An employee of a public body who is responsible for handling ATIPP requests for their public body. They are also often responsible for privacy related issues such as privacy breaches or privacy impact assessments. The ATIPP coordinator role may be a dedicated role or something done on the corner of an employee's desk.
- *ATIPP Regulations* (or the 'Regulations'): Nunavut's *Access to Information and Protection of Privacy Regulations*. Last updated in 2015, these are a specific legal document that clarifies many of the things mentioned in the *ATIPP Act* itself. This includes things like what fees can be charged, how requests for information can be made, the list of public bodies, and so on.
- *ATIPP request/request for information*: A request for any information held by a public body. The *ATIPP Act* has rules for how these requests must be handled by the public body.

- *Deputy Head*: This position is the highest ranking public servant in each department. The name may change department to department but they are often referred to as the *Deputy Minister*. This position has certain authority delegated from the Minister and is ultimately responsible for all operations of a public body. They may need to be included at certain stages of the ATIPP process. It is important that discussions happen internally in each department regarding when this happens and when the Deputy Head is involved.
- *Executive Council*: The cabinet of Nunavut's territorial government.
- *Exemption*: One of several specific reasons why a public body may refuse to give out information listed in the *ATIPP Act*.
- *Head of the Public Body*: The Minister responsible for a department or public agency. The Head is ultimately in charge of everything ATIPP related, but usually formally delegates this responsibility to one or more ATIPP Coordinators and the Deputy Head of a public body.
- *Information and Privacy Commissioner (IPC)*: An independent official in charge of monitoring the Government of Nunavut and its public bodies to make sure access to information and privacy rights are being upheld. The IPC investigates possible privacy issues and, if an applicant requests, will review the decisions of a public body relating to an ATIPP request. The IPC is the subject of Part 3 of these manuals.
- *Nunavut Court of Justice*: The consolidated Nunavut court. Following a review by the Information and Privacy Commissioner, if an applicant is unhappy with a decision made by a public body, they can appeal the decision to the court.
- *Office of Primary Interest (OPI)*: The division or person within a public body who likely has the records being requested.
- *Personal information*: Information about someone that can be identified to them specifically. Personal information is defined in section 2 of the *ATIPP Act* and includes:
 - a) The individual's name, home or business address or home or business telephone number,
 - b) The individual's race, colour, national or ethnic origin or religious or political beliefs or associations,
 - c) The individual's age, sex, sexual orientation, marital status or family status,
 - d) An identifying number, symbol or other particular assigned to the individual,
 - e) The individual's fingerprints, blood type or inheritable characteristics
 - f) Information about the individual's health and health care history, including information about a physical or mental disability,
 - g) Information about the individual's educational, financial, criminal or employment history, anyone else's opinion about the individual, and,
 - h) The individual's personal opinions, except where they are about someone else.
- *Public body*: Any department of the Government of Nunavut, as well all of the government-related organizations listed under Schedule A of the *ATIPP Regulations*.
- *Record*: Information in any form; written, photographed, videoed, or recorded in any other way.
- *Third party*: Another person or organization, who is not the applicant or a public body. Usually used in the context of 'information about a third party' or 'third party review'.

1.3 Fees Authorized by Legislation

The Authorization to assess fees is established under section 5(3) of the ATIPP Act, it states as follows:

(3) The right of access is subject to payment of any applicable fee.

Section 50 continues on to state the following:

Fees

50 (1) The head of a public body may require an applicant who makes a request under section 6 to pay the prescribed fees for services provided. Provision of fee estimate to applicant

(2) Where an applicant is required to pay fees for services, the public body shall give the applicant an estimate of the total fee before providing the services.

And finally, which fees are applicable, and how they are applied is authorized to be set by regulation under section 73(d):

Regulations

73. The Commissioner in Executive Council may make regulations

[...]

(d) respecting fees to be paid under this Act and providing for circumstances when fees may be waived in whole or in part;

Simply worded, while there is a right to information, fees may be assessed, and applicants must pay the fee in order to exercise this right.

1.4 Application Fee

The most common fee collected by most ATIPP Coordinators is the application fee. Not every request is subject to an application fee however, requests for personal information are not subject to an application fee, only requests for general information are subject to the application fee.

Fees for General Information are Mandatory: The application fee is set at \$25 by Section 11 of the *ATIPP Act* Regulations and this fee is mandatory unless otherwise waived. I think it is helpful to review the wording of Section 11:

11 (1) This section applies to a request for access to a record that is not a record of the personal information of the applicant.

(2) An applicant shall pay an initial fee of \$25.00 when a request is made.

(3) A public body shall not process a request until the initial fee has been paid.

(4) Other than the initial fee, fees may not be charged unless the total amount of the fees calculated in accordance with Schedule B, excluding the initial fee, exceeds \$150.00.

(5) Where the amount of the fees calculated in accordance with Schedule B, excluding the initial fee, exceeds \$150.00, the total amount of the fees is to be charged.

(6) A fee may not be charged for the time spent in reviewing a record, except for the time spent in reviewing the record in order to identify information that the public body is required to refuse to disclose in accordance with the Act. R-007-2015,s.6.

The request stops until a fee is paid: As you can see above in section 11(3), if an applicant has not paid the initial \$25.00 fee then the request process stops. The Territorial ATIPP Office may assign a tracking number at this stage, but we will not assign a due date until such a time that a fee is received.

Proof of payment: If the applicant is applying from a distance, they may send the cheque via the mail. The Government of Nunavut accepts proof of payment to start up the request process again. Records should not be released until such a time that the cheque is physically in your possession and has been submitted to your public body's corporate services division or financial officer for payment.

1.5 Personal versus General Information

Fitting the definition: In many cases it isn't difficult to determine if a request is for personal or general information. You can review the definition of "personal information" under Section 2 of the ATIPP Act for most applications to determine if the information being requested fits under that definition, if so, then it is a request for personal information and you can not charge the applicant the \$25 fee. As a reminder, this definition reads as follows:

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

- (a) the individual's name, home or business address or home or business telephone number,*
- (b) the individual's race, colour, national or ethnic origin or religious or political beliefs or associations,*
- (c) the individual's age, sex, sexual orientation, marital status or family status,*
- (d) an identifying number, symbol or other particular assigned to the individual,*
- (e) the individual's fingerprints, blood type or inheritable characteristics*
- (f) information about the individual's health and health care history, including information about a physical or mental disability,*
- (g) information about the individual's educational, financial, criminal or employment history,*
- (h) anyone else's opinions about the individual, (i) the individual's personal opinions, except where they are about someone else;'*

Unclear or hybrid cases: There are applications where it is not clear whether the request for information is for personal or general information. This is particularly true of requests by employees or former employees for records pertaining to their time working for the Government of Nunavut. These requests will normally be for "any and all" records containing the employee's name. What this ends up capturing is routine work, correspondence and other reporting that is part of the employee's normal duties.

Work is not personal information: Work completed during your normal duties as a Government of Nunavut employee is generally not your own personal information, however an employees name will appear in multiple places, such as the to or from line in an e-mail chain. This records would not constitute personal information. The exceptions include, but are not limited to; most human resources issues (leave forms, accommodations, workers compensation request etc.), employee relations investigations, personal e-mails regarding the employee's life outside of work, grievances and, some workplace disputes.

Work with the applicant first: Before you assess fees for these types of request (even the application fee), it is highly recommended that you contact the applicant and assist them with the wording of their request. They often are not aware of how broad a request for "any and all" records pertaining to their name can be. A common way to narrow the scope of the request to avoid general information being included in the request is to narrow the request to specific workplace incidents, ie. An employee relations investigation, allegations of harassment made about a superior, discussions between supervisors regarding a grievance made by the employee etc.

Check the percentage: If the applicant is not willing to narrow the scope of their request, you should talk to the office of primary interest (OPI) at this point and review the records that they provide to you. If the majority of records are general information and the minority are personal information of the applicant, you should request the application fee. This doesn't need to be an exact percentage, and you may need to estimate this amount without having the full number of records responsive to the request. If after assessing the fee it becomes clear that most records are personal information, you should refund the applicant the \$25 fee.

Make the decision quickly: You should do this as soon as possible after receiving a

request where it is unclear whether or not the request is for personal information. If you wait too long to make this determination it may look like we are stalling the request. The ATIPP Office may also consider time spent making this decision as part of your 25 days to respond to the request when determining a due date.

Assess the fee: Once you've discussed the matter with the applicant, and if they aren't willing to exempt the general information from the request, you can send them a letter requesting the \$25 fee. You should let them know that you will be doing during your conversation with them so the letter isn't a surprise to them. Provide them as many details as possible as to how you came to this determination.

Information and Privacy Commissioner Review:

It is important to remember decisions regarding fees, including assessment of fees, waiver of fees and whether or not a request is general information for the purposes of collecting fees, are all subject to review by the information and privacy commissioner.

We should be documenting and providing justification for any decision made regarding fees as a best practice, but also to substantiate our decisions in case a review by the Information and privacy commissioner is initiated.

1.6 Additional Fees

In addition to the \$25 application fee, which is mandatory unless waived, the public body also is able to assess additional fees in accordance with Schedule B of the Regulations (which we'll go into greater detail on in Section 2 of this Manual).

“Free Time”: The Regulations specify that you cannot assess these additional fees for general information unless they'd exceed \$150 dollars, which includes the \$25 application fee. At 6.75 per ¼ hour or, \$27 per hour, this represents roughly 5 hours of free billable hours to the applicant. Free time is in air quotes however because it's only free until the fees exceed \$150 dollars, at which time the full amount is payable.

Fees for Personal Information: the only fee that you can assess for personal information is \$0.25 per page for copying. In a digital age, with most requests done electronically, this means that except for in rare cases, no fees are applicable. Like with general information, you cannot assess additional fees for personal information unless the fees exceed a dollar figure. For personal information that figure is \$25, which means that roughly the first 100 pages is free unless the number of pages exceeds this much.

Creating a Fee Assessment: If you're going to charge an applicant additional fees, you must provide them a letter with as much detail as possible as to how you determined the fee you are requesting.

You must provide at least the following as a breakdown (from the Regulations):

“10. (1) An estimate of fees provided under subsection 50(2) of the Act must set out

(a) the time and cost required to

(i) search for and retrieve the record,

(i.1) review the record in order to identify information that the public body is required to refuse to disclose in accordance with the Act,

(ii) prepare and physically sever the record for disclosure, and

(iii) copy the record;

(b) the cost of computer time involved in locating and copying a record, or, if necessary, programming to create a new record;

(c) the cost of supervising an applicant who wishes to examine the original record, where applicable; and

(d) the cost of shipping the record or a copy of the record.”

Provide details: It is highly recommended that you provide as detailed a background as possible. If you can break it down by topic, individual providing the record, year, or other subcategory, this can assist the applicant in narrowing their scope to a more manageable proportion.

Request on hold: once you've provided the fee estimate to the applicant the deadline is on hold until such a time that the applicant either pays 50% of the fees assessed or they have contacted you about reducing or narrowing the scope of the request.

1.7 Calculating and Tracking Time

Estimating time for the purpose of responding to an ATIPP request is somewhat dependent on the ATIPP Coordinator's experience and work speed. A general good place to start is approximately 2 minutes per page for time required to search for the record, review for mandatory exemptions, and prepare it for release. You can then make a quick estimate of the number of hours required and the cost for the work with some simple calculations:

$$\# \text{ of pages} \times 2 \text{ minutes per page} \div 60 \text{ minutes per hour} \times \$27 \text{ per hour} (\$6.75 \text{ per } \frac{1}{4} \text{ hour as per schedule B of the Regulations}) = \text{Estimate for work required}$$

New ATIPP Coordinators may want to start with an estimate slightly higher, ie. at 3 minutes per page, accounting for their lack of experience, and long serving ATIPP Coordinators may want to estimate a lower figure, 1 minute per page.

Tracking your work: If you're charging additional fees to the applicant, it is vitally important that you track your time spent working on the ATIPP request. Every quarter hour must be accounted for. Keep a log of how long you spend working on each specific ATIPP request, ensuring that you are specific to the date the work occurred and during what times. An example can be seen below:

Example work log:

March 20, 2020	Worked on request 1029-20-EIA0255 from 9:00 am to 10:30am (Severed personal information of third parties from pages 1-100) Worked on request 1029-20-EIA0255 from 10:45 to 12:00 (Severed personal information from pages 101-200)
March 22, 2020	Worked on request 1029-20-EIA0255 from 1:30 to 3:00 (Prepared the records for release to the applicant)

It is important to remember that we can only charge for the actual time spent on the itemized list provided to the applicant. If our actual time spent on the request is less than the amount quoted to the applicant, then we have an obligation to provide them a refund for the difference. For more information on this final calculation please see Section 1.8 of this manual below.

1.8 Final Invoice

After the work has been completed and the department has an accurate accounting of the billable time and resources spent on the ATIPP request, a final letter should be sent to the applicant outlining:

1. The actual time spent on the request for information;

2. The outstanding amount following subtraction of the 50% down payment.

If you overestimated how long a request would take you, and the cost is lower than 50% of the fees assessed, you must refund the applicant the difference.

If the amount is over 50% and less than the remaining 50%, the applicant has to pay the outstanding amount.

If you calculated correctly, then the applicant must pay in full the remaining amount. Below is the section of the Act requiring that you only charge specifically for the actual cost of time and resources spent on the request, using Schedule B of the ATIPP Act as a guide for what you can charge for.

From the Act:

9. (1) Where an applicant is required to pay a fee for services, the fee is payable in accordance with sections 10 to 14.

(2) Fees assessed under sections 11 and 12 must not exceed the actual costs of the services provided.

13. (1) The public body shall cease processing a request once a notice of the estimate of fees has been forwarded to an applicant and shall recommence the processing of the request without delay on

(a) the receipt of an agreement to pay the fees; and

(b) the receipt of at least 50% of any estimated fee that exceeds \$150.00.

(2) The balance of any fees owing must be paid before the information is delivered to the applicant.

(3) An applicant shall be charged the lesser of

(a) the amount of the estimate of fees provided under subsection 50(2) of the Act; and

(b) the actual fees calculated in accordance with Schedule B.

(4) Where an applicant has paid an amount exceeding the actual fees require

2 – Breakdown of the Fee Schedule



2.1 Introduction

Schedule B of the ATIPP Act, last amended in 2015, sets out the maximum fees that can be assessed under the ATIPP Act. The biggest change to the regulations in 2015 was to remove references to microfiche and other outdated models of data transmission and to include a blanket section for newer models of data transmission, which an ATIPP Coordinator can assess to the applicant for the actual cost to the public body. This means that as technology changes and grows, the Regulations can still be used to assess fees where appropriate.

Below, beside the relevant section of Schedule B, is a description of what the fee is, and some common examples of what this entails.

2.2 The Fee Schedule Explained

<u>From the Regulations:</u>	<u>Explanation:</u>
<p>The amount of the fees set out in this Schedule are the maximum amounts that can be charged to applicants.</p> <p>1. For searching for and retrieving a record \$6.75 per 1/4 hour</p> <p>2. For producing a record from an electronic record: (a) computer processing and related charges actual amount charged to public body (b) computer programming \$10.00 per 1/4 hour</p>	<p>Fees are a maximum: It's important to note that if the actual work is less than the amount assessed that you must refund the difference.</p> <p>Searching: For manually searching records from an outlook data file, it will depend on your experience and confidence with the program. A senior ATIPP Coordinator may only take 2 hours, a more junior ATIPP Coordinator may take 3 or 4 hours. The best way to determine this figure for your estimate is to do a search of one of the accounts you've received. Track how long it takes you and use that figure to estimate the remaining time.</p> <p>Third party costs: generally, this section is used for third party costs related to information management. Some data stored tracked by the GN is stored and managed by outside parties ie. Court data. These third parties may charge the GN to retrieve or analyze the data to the applicant's specification. This can be quite expensive and there may be a benefit to the public body, so a fee waiver may be recommended. See Section 3 of this manual on fee waivers for more information.</p>

<p>3. For reviewing, preparing and handling a record for disclosure \$6.75 per 1/4 hour</p>	<p>Mandatory Exemptions only: The only review and severing we can charge the applicant for is the review and severing of information is mandatory to exempt from release: Sections 13, 20.1, 23 and 24 of the ATIPP Act are the most common mandatory exemptions. For more information on mandatory vs. discretionary exemptions, please see Manual 2.</p>
<p>4. For supervising the examination of a record \$6.75 per 1/4 hour</p>	<p>Video recordings: The most common place this is seen is where video recordings are requested. Because other personal information or security information may be on the recording, the public body may require that the applicant view it in a secure location.</p> <p>Historical significance: This may also be necessary when the record is of a significant historical value and can't be copied without destroying the original, or the applicant wants to view the original and not a copy.</p> <p>Talk to the applicant: You will want to talk to the applicant to determine how long they will need to review the record to estimate the cost to the applicant. They can make an informed choice based on the cost to them for the supervision.</p>
<p>5. For shipping a record or a copy of a record actual amount charged to public body</p>	<p>Registered Mail: sensitive information should only be sent registered mail, you can receive an estimate of the cost of shipping by weighing and measuring the package and comparing it to Canada Post's standard rates for registered package delivery.</p>
<p>6. For copying a record: (a) photocopies, hard copy laser print and computer printouts \$0.25 per page</p>	<p>Limitations: this section of the fee schedule is the only one that can be charged for a request for personal information, but, if you're responding to the applicant by e-mail or managing the request using electronic means, you cannot charge for copying the record. Remember, fees can only be charged for expenses actually incurred by the public body.</p>

- (b) repealed, R-007-2015,s.9(b)
- (c) repealed, R-007-2015,s.9(b)
- (d) repealed, R-007-2015,s.9(b)
- (e) repealed, R-007-2015,s.9(b)
- (f) repealed, R-007-2015,s.9(b)
- (g) repealed, R-007-2015,s.9(b)
- (h) repealed, R-007-2015,s.9(b)
- (i) plans and blueprints \$5.00 per sq. m
- (j) duplication of slide \$2.00 per slide
- (k) duplication of audio cassette \$5.00 per tape
- (l) duplication of video cassette (1/4", 1/2" or 8mm - 1 hour) \$20.00 per tape
- (m) duplication of video cassette (1/4", 1/2" or 8mm - 2 hours) \$25.00 per tape
- (n) duplication of video cassette (3/4" - 30 minutes) \$18.00 per tape
- (o) duplication of video cassette (3/4" - 1 hour) \$23.00 per tape
- (p) any other media not listed above, including copying any type of record to such other media:
 [Charged at] actual amount charged to public body, including cost of media

Flexible by design: this section is flexible to allow for the actual costs to be charged to an applicant for media required to provide them a copy of their record. Examples include; flash drives, removable hard drive, rewritable CDs and DVDs etc.

3 - Fee Waivers



3.1 Introduction

Central to the assessment of fees is the idea that fees may also be waived in the appropriate circumstances. Ultimately, the right to information is a right, and so fees cannot act as a barrier to access. The Regulations states as follows regarding fee waiver:

Waiver of Fees

14. The head of a public body may excuse the applicant from paying all or part of a fee if, in the opinion of the head, the applicant cannot afford the payment or, for any other reason, it is fair to excuse payment.

There are two parts to this provision, 1. That the public body may excuse the fee if the applicant can't afford to pay and, 2. Any other reason, it is fair to excuse payment.

There is a great deal of vagueness in this provision of the Regulations, however there is precedent from the Information and Privacy Commissioner (IPC) to consider regarding the public interest. Ultimately the discretion lies with the public body, who will have to make the decision they find the fairest. Remember, the decision whether to waive fees can be reviewed by the IPC and ultimately the Nunavut Court of Justice, so it is important that we adequately justify our decision to the applicant when a fee waiver is requested.

3.2 Delegation of Authority for Fee Waiver

Like other decisions under the ATIPP Act, the decision to waive fees is assigned to the head of the public body. A proper delegation of authority is required to make the decision whether or not to waive fees. Most decisions are delegated to the ATIPP Coordinator responsible for the department, but in the case of fee waivers, the discretion is generally only provided to the Deputy Minister.

Ensure you know who is delegated to make this decision in your department and that all delegations are up to date before making the decision to waive fees.

3.3 When to Consider a Fee Waiver

The act provides two circumstances for when it is appropriate to waive fees;

1. If the applicant cannot afford to pay; or,
2. For any other reason the public body deems fair.

While it isn't mandated under legislation, the general practice is to have the applicant provide a rationale as to why the public body should consider waiver of fees. This is commonly seen with members of the news media, who request a waiver of fees because their profession is, by definition, in the public interest. The discretion still lies with the public body, and this is an opportune time to discuss the scope of the request. Generally if an applicant is narrowing their scope to a reasonable degree so as not to impact the capacity of a public body, it is also fair to consider waiver of some or all of the fees.

3.4 Consideration of Public Interest

The public interest in the records is generally reviewed during the context of a fee waiver. The “public interest” is broadly understood to be information that is likely to contribute significantly to public understanding of the operations or activities of the government or is of major interest to the public in terms of environmental protection or protection of public health or safety. Some factors for and against whether something is of the public interest include:

Factors in the public interest:

- Will there be a significant benefit in disclosure of the record to a population of some size, which is distinct from any benefit to the applicant?
- Will the information in the records being disclosed meaningfully contribute to the development of public understanding of the subject of the request?
- If the request involves a research proposal, is there an undertaking that the results of the research will be widely disseminated to the public; does the applicant appear to have the qualifications and ability to assure such dissemination and does it appear that the research has an academic or public policy value?
- Has the information already been disclosed without charge to previous applicants?

Factors that it is not in the public interest:

- Is the request dealing with information in which the applicant potentially has a commercial interest?
- Is the information of broad interest to the public or of narrow interest only to the applicant?

Guidance from the IPC:

In Review Report 17-126, the IPC makes note of several different standards used to determine the public interest in the context of a fee assessment. It's worth reviewing for anyone asked to provide evidence that they considered the public interest. One passage in Review Report 17-126 is of particular relevance; As quoted from Alberta Order 96-002:

Whether there is a public interest in records depends on balancing the weight that should be given to `curiosity' versus `benefit' when considering `interest,' and `broad' versus `narrow' when considering `public.' A request that relates to a matter of broad public benefit is more likely to be a matter of public interest. A request that arises from narrow personal curiosity is least likely to be a matter of public interest.