



Burden of Proof

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INTRODUCTION

In the Canadian justice system, parties to a dispute can appear before a decision-maker, such as a judge, to request that the decision-maker make a ruling in favour of either party on a matter. Parties present evidence to the decision-maker. “Evidence” is information or material that establishes facts upon which the decision-maker will base a decision. To be successful, a party will be required to prove certain facts and present arguments according to a particular standard of proof. Lawyers refer to this requirement as the “burden of proof.” This Bulletin will discuss burden of proof under the *Freedom of Information and Protection of Privacy Act* (the FOIP Act), where the decision-maker is the Information and Privacy Commissioner of Alberta.

The role of the Information and Privacy Commissioner differs in a number of important respects from the role of a judge in the court system.

Section 2 of the FOIP Act provides for “independent reviews” of “decisions made by public bodies.” The Commissioner’s role is not limited to adjudication.

As an independent reviewer, the Commissioner must consider mandatory exceptions to access regardless of whether the public body has applied those exceptions. The Commissioner can also raise issues that have not been raised by any of the parties and can request additional evidence. Ultimately, the Commissioner must decide whether the public body correctly applied the Act.

The purpose of this Bulletin is to explain who has the burden of proof in the Commissioner’s review processes and how the burden of proof is met.

Publications produced by Access and Privacy, Service Alberta, cited in this Bulletin are available on the FOIP website at foip.alberta.ca. Decisions, practice notes and publications issued by the Office of the Information and Privacy Commissioner of Alberta may be found on the OIPC website at www.oipc.ab.ca.

MEANING OF “BURDEN OF PROOF”

The term “burden of proof” has two components. The Supreme Court of Canada, in *R. v. Stone* [1999] 2 S.C.R. 290, has contrasted the “evidential burden” with the “legal or persuasive burden” as follows.

The significance of the *evidential burden* arises when there is a question as to which party has the right or the obligation to begin adducing evidence. It also arises when there is a question as to whether sufficient evidence has been adduced to raise an issue for determination by the trier of fact.

The *legal burden* of proof normally arises after the evidence has been completed and the question is whether the trier of fact has been persuaded with respect to the issue or case to the civil or criminal standard of proof.

The legal burden, however, ordinarily arises after a party has first satisfied an evidential burden in relation to that fact or issue.

When it is said in this bulletin that a party has the “burden of proof,” what is meant is that one party has a duty in law first to bring forward evidence that a particular fact or situation exists, and then to persuade the Commissioner that the evidence meets the necessary standard of proof.

For example, if a public body applies **section 20(1)(a)** to refuse access to law enforcement information, it falls to the public body to bring forward some evidence that disclosure could reasonably be expected to harm a law enforcement matter. If the public body is able to convince the Commissioner of this, the public body will have met the burden of proof.

STANDARD REQUIRED TO MEET BURDEN OF PROOF

In law there are different standards that must be met in order to satisfy the burden of proof. These standards are applied in different situations. The one most people are familiar with is the standard of proof “beyond a reasonable doubt.” This standard applies in criminal cases. Civil cases, such as cases involving contractual disputes, have a lesser standard. That standard is proof “on a balance of probabilities” or “on a preponderance

of evidence.” In hearings before the Commissioner, this lesser standard applies.

“Balance of probabilities”

The term “balance of probabilities” is difficult to define, but it is more than a mere possibility. It has been taken to mean that the person deciding a case must find that it is more probable than not that a contested fact exists.

In the FOIP context, a party will have proven its case on a balance of probabilities if the Commissioner can say: “I think it is more likely, or more probable, than not.”

The term “preponderance of evidence,” which is also used in the Commissioner’s Orders, means the same thing as “balance of probabilities.” If the Commissioner reaches a conclusion on the basis of a preponderance of evidence, this means that the Commissioner has considered and weighed the evidence presented by both parties and the Commissioner is convinced by the persuasiveness or accuracy of one party’s evidence over the other party’s evidence.

A party to an inquiry before the Commissioner is required to prove something on a balance of probabilities only when the party has the burden of proof.

For example, if an applicant has been refused access to personal information of a third party, the applicant can request a review of the decision. It is up to the applicant to prove that disclosure of the information would not be an unreasonable invasion of the third party’s personal privacy. To satisfy this burden, the applicant must provide sufficient evidence to convince the Commissioner that it is more probable than not that disclosure of the personal information would not be an unreasonable invasion of privacy. If an applicant is able to do that, the case will have been proven on a balance of probabilities.

WHO HAS THE BURDEN OF PROOF UNDER SECTION 71

Section 71 of the FOIP Act establishes which party has the burden of proof in a review of a public body’s response to an access request.

When a public body has refused to disclose all or part of a record

When a public body refuses to disclose information to an applicant, **section 71(1)** of the FOIP Act places the burden of proving that the information should not be disclosed on the public body.

Despite this general principle, the Act makes an exception in the case of third party information.

When a public body has refused to disclose a third party's personal information

When a public body refuses to disclose a third party's personal information, **section 71(2)** of the FOIP Act requires the applicant to prove that disclosure of the information would not be an unreasonable invasion of the third party's personal privacy.

Because of **section 71(2)**, the burden of proof under **section 17** (personal privacy) is two-fold. If a public body withholds information under **section 17**, the public body is required by **section 71(1)** to prove that **section 17** does, in fact, apply to the personal information that it is refusing to disclose. **Section 71(2)** then requires the applicant to prove that the disclosure would not be an unreasonable invasion of the third party's personal privacy.

A public body has a duty to inform applicants of all of the grounds on which it is refusing access. This is particularly important when the public body is denying access on the basis that disclosure would be an unreasonable invasion of a third party's privacy under **section 17**. Since the applicant will bear the burden of proving that disclosure of third party personal information would *not* be an unreasonable invasion of privacy, the applicant needs to be fully informed of the grounds upon which the public body is refusing to disclose the personal information (*IPC Order F2003-025*).

The burden of proof under **section 71(2)** is not "triggered" unless **section 17** becomes an issue at inquiry. This can occur if a public body has relied on **section 17** to refuse access to records or if, in the course of the review process, the Commissioner raises the issue of applying **section 17** (*IPC Order F2004-003*).

An applicant may meet the burden by showing that one of the circumstances listed in **section 17(2)** of the FOIP Act applies. **Section 17(2)** lists circumstances when the disclosure of personal information is not an unreasonable invasion of a third party's personal privacy (*IPC Order F2003-016*).

In some cases it is difficult for the applicant to prove that the disclosure of information would not be an unreasonable invasion of privacy when he or she does not know the exact nature of the personal information contained in the records. For this reason, and because of the Commissioner's role as an independent reviewer, the Commissioner will still review the application of the FOIP Act by the public body. If the Commissioner finds that the public body did not correctly apply the Act, the applicant will not have to prove that it is not an unreasonable invasion of a third party's personal privacy to disclose the records (*IPC Order 98-004*).

In any case, the public body should always be prepared to defend its decision not to disclose the information despite the requirements of **section 71(2)** of the FOIP Act.

When a public body has decided to disclose a third party's information

When a public body decides to disclose information about a third party, the third party can ask the Commissioner to review that decision. If the information is personal information, **section 71(3)(a)** of the FOIP Act requires the applicant to prove that the disclosure would not be an unreasonable invasion of the third party's personal privacy.

If the information is not personal information, **section 71(3)(b)** of the Act requires the third party to prove that the applicant has no right of access to the information. In *Qualicare Health Service Corporation v. Alberta (Office of the Information and Privacy Commissioner)*, 2006 ABQB 515, the Court commented on evidentiary requirements for discharging the burden of proof, saying that "the requirement of some cogent evidence permits the ... Commissioner to discharge his duty of balancing competing interests and policy considerations by rationally assessing the likelihood of reasonable expectations of harm."

WHO HAS THE BURDEN OF PROOF IN SITUATIONS NOT ADDRESSED IN SECTION 71

Section 71 does not specifically establish who has the burden of proof in every situation. For example, the FOIP Act does not specifically address disclosure of personal information in contravention of **Part 2** of the Act or on matters relating to the assessment of fees.

Where the FOIP Act does not explicitly state which party has the burden of proof, the Commissioner will determine where the burden lies. When making that determination, the Commissioner has considered the following two criteria:

- who raised the issue, and
- who is in the best position to meet the burden of proof.

Normally if a party raises an issue and it is in the best position to meet the burden of proof, that party will bear the burden.

Disclosure of personal information under Part 2

Section 71 does not establish who has the burden of proof when an individual claims that a public body disclosed the individual's personal information in contravention of privacy provisions of the Act.

For example, in *Order 97-004* the applicant alleged that a public body disclosed the applicant's personal information in contravention of the privacy provisions of the FOIP Act. Since only the applicant knew the reasons for the applicant's concern, the Commissioner determined that the applicant was in the best position to meet the burden of proof. Since the applicant had raised the issue, and was also in the best position to meet the burden of proof, the Commissioner ruled that the applicant should bear the burden of proof in that case.

In *Order F2003-017*, which concerned both an access request and a breach of privacy complaint, the Adjudicator affirmed the rationale in *Order 97-004*. Since the applicant raised the issue, he had the initial burden to establish that his personal information was disclosed as he alleged. The Adjudicator said that, if disclosure of personal information is proven, the

burden then shifts to the public body to justify the disclosure under the FOIP Act.

Assessment of fees

In *Order 99-014*, the Commissioner decided that the public body had the burden of proof in a review of a fee estimate. He reasoned that, although the applicant raised the issue, only the public body knew the processes and standards that it used to calculate the fees.

In cases involving fees, the Commissioner has ruled that the applicant has the burden of proof when the applicant has requested a review of a public body's decision not to excuse fees. In *Order 96-002*, the Commissioner considered this issue and reasoned that the applicant was in the best position to put forward the grounds upon which he or she was seeking to be excused from payment of fees.

In *Order 2001-023* the Commissioner considered a request for a waiver of fees based on a claim that the records related to matter of public interest (**section 93(4)(b)**).

The Commissioner found that, while the burden of proving public interest in a requested record lay with the applicant, the applicant did not exclusively hold the burden of proof. The public body was also required to form an opinion as to whether the records related to a matter of public interest, taking into account all the facts and circumstances, not simply the arguments presented by the applicant. The public body was required to present this evidence in order to discharge its burden of proving that it exercised its discretion appropriately under **section 93(4)(b)** in denying a fee waiver. (See also *IPC Order F2003-011*).

Other situations

Table 1 on the next page summarizes how the Commissioner has ruled on who has the burden of proof in other situations not covered by **section 71**.

It should be noted that the Commissioner is not bound by his previous decisions. He will decide each case on the basis of the specific circumstances of that case. Although this table sets out some examples of how the Commissioner has ruled on the issue of burden of proof, it does not guarantee that he will rule the same way in the future.

Table 1: Commissioner's rulings on burden of proof in situations not covered by section 71

ISSUE	PARTY BEARING THE BURDEN OF PROOF
Did a public body exercise its discretion under the FOIP Act properly?	The public body (<i>IPC Order 2001-013</i>)
Is a record excluded from the operation of the FOIP Act? (section 4)	The public body (<i>IPC Order 2000-022</i>)
Does another enactment prevail over the FOIP Act? (section 5)	The public body (<i>IPC Order 98-007</i>)
Is information responsive to an applicant's access request?	The public body (<i>IPC Order 2001-037</i>)
Has an adequate search for records been conducted? (section 10)	The public body (<i>IPC Order 97-006</i>)
Has the public body responded to an applicant openly, accurately and completely? (section 10)	The public body (<i>IPC Order F2005-020</i>)
Was it appropriate for the public body to refuse to confirm or deny the existence of a record? (section 12(2))	The public body (<i>IPC Order 2000-016</i>)
Did the public body properly extend the time for responding to a request? (section 14(1))	The public body (<i>IPC Order F2005-012</i>)
Did the public body properly transfer the applicant's request? (section 15)	The public body (<i>IPC Order 2000-021</i>)
Did a party waive legal privilege? (section 27)	The party asserting waiver (the applicant in a request for access to information subject to legal privilege) (<i>Adjudication Order No. 3</i>)
Should information be disclosed because of the existence of "emergency-like" circumstances? (section 32(1)(a))	The applicant (when the applicant asserts that section 32(1)(a) applies) (<i>IPC Order 96-011</i>)
Should information be disclosed if disclosure is clearly in the public interest? (section 32(1)(b))	The applicant (when the applicant asserts that section 32(1)(b) applies) (<i>IPC Order 96-011</i>)
Has personal information been collected for a proper purpose? (section 33)	The public body (<i>IPC Order 98-002</i>)
Was personal information used to make a decision about an individual accurate and complete? (section 35)	The public body (<i>IPC Order 98-002</i>)
Is there an error or omission in an applicant's personal information? (section 36(1))	The applicant (<i>IPC Order 97-020</i>) (The public body may be required to provide additional information to the applicant for the applicant to meet this burden of proof (<i>IPC Order 98-010</i>))
Was a public body justified in deciding not to correct personal information? (section 36(1))	The public body (<i>IPC Order 97-020</i>)
Was a public body justified in deciding to annotate or link information? (section 36(2))	The public body (<i>IPC Order 2000-001</i>)
Has personal information been disclosed improperly? (section 40)	The applicant in the first instance (<i>IPC Order 97-004</i>); then public body to show that disclosure was permitted (<i>IPC Order F2003-017</i>)
Did a public body disclose third party personal information in contravention of Part 2? (section 82)	The public body employee asserting that the contravention occurred (<i>IPC Investigation Report 2003-IR-004</i>)
Is a person a "personal representative" for the purposes of the FOIP Act? (section 84)	The applicant (<i>IPC Order 98-004</i>)
Has an applicant requested the applicant's own personal information? (section 93(2))	The public body (<i>IPC Order 97-003</i>)

ISSUE	PARTY BEARING THE BURDEN OF PROOF
Is a fee estimate appropriate? (section 93(3))	The public body (<i>IPC Order 99-014</i>)
Should a fee waiver be granted? (section 93(4))	The applicant (<i>IPC Order 96-002</i>)
Should a fee waiver be granted on the basis of inability to pay? (section 94(4)(a))	The applicant (<i>IPC Order F2003-011</i>)
Should a fee waiver or a reduction of fees be granted based on matters of public interest? (section 93(4)(b))	The applicant and to some extent the public body (<i>IPC Order 2001-013</i>)

WHAT MUST BE PROVEN

The Commissioner has provided a considerable amount of guidance on interpreting the FOIP Act in his Orders and Investigation Reports. He has considered the meaning of certain words and phrases in the legislation and has established tests and criteria that must be met before certain provisions of the Act can be applied. These tests and criteria, if applicable, need to be taken into consideration when a party is deciding how best to discharge the burden of proof.

An example is the “harms test.” Many of the provisions in **Part 1** of the FOIP Act require a party to establish that harm can reasonably be expected to occur if information is disclosed.

In order to establish that harm could reasonably be expected to result from a disclosure of information, the Commissioner requires the party to satisfy the harms test (*IPC Order 96-003*). That test requires the party to show that:

- there is a clear cause-and-effect relationship between the disclosure and the alleged harm;
- the harm caused by the disclosure amounts to “damage” or “detriment,” not simply hindrance or minimal interference; and
- the likelihood of harm is genuine and conceivable, and not merely speculative.

See IPC FOIP Practice Note 1: *Applying Harms Tests*.

Different tests and criteria have been established for many of the provisions in the FOIP Act. See *FOIP Guidelines and Practices*, produced by Access and Privacy, Service Alberta, or the *Annotated Alberta FOIP Act*, available from the Queen’s Printer, for further information on the interpretation and application of specific provisions of the Act.

If a party is relying on a particular provision of the FOIP Act, it must provide sufficient evidence to satisfy the Commissioner that the test has been satisfied or the criteria have been met.

AMOUNT AND TYPE OF EVIDENCE REQUIRED TO MEET THE BURDEN OF PROOF

It cannot be said with any certainty what amount or type of evidence will be required in order for a party to meet its burden of proof. The Commissioner will consider the specific circumstances of the case when determining the sufficiency of the evidence.

The Commissioner may also raise issues that have not been raised by any of the parties and invite submissions on those issues during the course of an inquiry. Since the role of the Commissioner is to provide independent reviews of decisions made by public bodies under the FOIP Act (**section 2(e)** and **section 65(1)**), the Commissioner may need to consider additional evidence in some cases.

The nature of the evidence presented at an inquiry will depend on whether the inquiry is conducted orally or in writing. The form of the inquiry is decided by the Commissioner (under **section 69(4)** of the FOIP Act).

In a written inquiry, the evidence required to meet the burden of proof is submitted in writing. The Office of the Information and Privacy Commissioner provides some guidelines on the format of submissions in IPC FOIP Practice Note 5: *Preparing Records and Submissions for Inquiries*. (See also *Changes to Inquiry Procedures* (effective October 14, 2009) for changes to this practice note with respect to the exchange of submissions, time extensions, and *in camera* submissions.)

In an oral inquiry, the Commissioner hears oral argument and testimony, as well as receiving written submissions.

Since the Commissioner is often faced with weighing conflicting evidence, the parties should ensure that they present evidence required to meet the burden of proof in the most complete, factual and credible way possible.

At any inquiry, the Commissioner must make findings of fact based on the evidence, whether this is given by oral testimony or by written submissions. The Commissioner also considers arguments concerning the interpretation of the law in relation to the facts presented.

In FOIP Practice Note 10: *Public Bodies' Evidence and Arguments for Inquiries*, the Commissioner stated:

Public Bodies do not meet the burden of proof if they do not provide evidence to support written or oral arguments made in inquiries. Providing arguments alone is not sufficient. Arguments are not a substitute for evidence.

Public Bodies that do not provide evidence for inquiries risk having decisions go against them for lack of evidence to support their arguments.

The Commissioner decides what evidence to rely on and how much weight is given to that evidence. In making that decision, the Commissioner considers whether the appropriate person has given the evidence and examines the logic and consistency of what is stated in it, as well as any issues of credibility (*IPC Order 97-011*).

The Commissioner normally gives sworn oral and affidavit evidence much more weight than evidence not given under oath (*IPC Order 97-016*). The Commissioner has provided guidance in various Orders on the sufficiency and quality of evidence required to appropriately discharge the burden of proof. The following are some examples.

- In *Order 2000-031*, the Commissioner found that an applicant asserting that records should be disclosed in the public interest under **section 32(1)(b)** did not meet the burden since the applicant failed to provide reference to Orders,

empirical or concrete data or non-speculative and supportive evidence to sustain his arguments.

- In *Order F2003-017*, the Adjudicator stated that the applicant, who claimed that the public body had breached his privacy, failed to provide specific and clear evidence to support his allegations. The Adjudicator compared this to the evidence of the public body, which he preferred because it was candid, specific and provided in the form of affidavits from individuals with personal knowledge of the disclosures.
- In *Order F2005-024*, the Adjudicator accepted the public body's detailed information about its search process and methodology as evidence that the public body had conducted an adequate search for responsive records.
- In *Order F2004-026*, the Commissioner stated that direct evidence, in affidavit form, from the head of the public body as to how it exercised its discretion is preferable to written assertions by the public body about what the head considered.

Submission of evidence by an applicant

In any review arising from a denial of a request for access to records made under the FOIP Act, it is the public body that must answer to the Commissioner by saying why it refused to disclose the records. The applicant is not *required* to submit evidence in an inquiry, because the Commissioner can make a decision as to whether the public body correctly applied the Act without the applicant's involvement in the inquiry, with no prejudice to any of the other parties.

However, an applicant may need to submit oral or documentary evidence to the Commissioner to meet the burden of proof. This would be the case when, for example, personal information of a third party is involved. In that situation, it would be up to the applicant to prove why disclosure of the information would not be an unreasonable invasion of the third party's personal privacy.

Other situations where an applicant might need to submit evidence may arise when an applicant claims that a party has waived legal privilege, that information should be disclosed in the public interest, or that the applicant is unable to pay a fee.

A complainant who alleges that a public body has disclosed his or her personal information in contravention of **Part 2** of the FOIP Act must provide some credible evidence of the disclosure (*IPC Order F2006-016*).

It should be noted that if a party requests a review and then fails to provide a written inquiry submission, the Commissioner may decide not to proceed with the inquiry (*Changes to Inquiry Procedures*).

Submission of evidence in private

In certain cases, a party to an inquiry may find that, to meet its burden of proof, the party needs to present evidence of a sensitive or confidential nature to the Commissioner in private. These submissions are called *in camera* submissions and can take place in both written and oral inquiries. *In camera* submissions may be permitted in cases where disclosure of one party's evidence to all the parties to the inquiry could result in disclosure of the information at issue, defeating the purpose of the inquiry.

The FOIP Act provides for some of these situations in **section 59(3)**. This provision states that in conducting an inquiry, the Commissioner must not disclose any information that a public body would be required or authorized to refuse to disclose to an applicant.

The Act also contains confidentiality provisions of a more general nature. **Section 69(3)** states that no one is entitled to be present during, to have access to, or to comment on representations to the Commissioner by another person. A party to an inquiry may request permission to make a submission to the Commissioner in private. The Commissioner has indicated that, in making his decision, he will consider the principles of procedural fairness as well as the importance of promoting full and open representations (*IPC Order F2004-018*). For further information, see IPC FOIP Practice Note 8: *In Camera Written Submissions for Inquiries*. See also *Changes to Inquiry Procedures* (effective October 14, 2009) for significant further guidance on *in camera* submissions.

The Commissioner has broad discretion to decide procedural matters relating to all inquiries.

Formal rules of evidence

When a party appears in a court before a judge, there are very formal rules about what kinds of evidence can be produced and how the evidence can be produced. However, not all tribunals are governed by the strict rules of evidence that apply in the court system. In *Order 97-016*, the Commissioner affirmed that he is not bound by the formal rules of evidence, and it has been the Commissioner's practice not to restrict the amount and type of evidence that a party may submit. (See also *IPC Order F2002-016*.)

Parties to an inquiry are not generally required to submit originals of the records that are the subject of an inquiry. This is not only because public bodies require their records for ongoing business purposes, but also because inquiries are frequently concerned with the way in which a public body has severed records for disclosure, which is best demonstrated by marked-up copies. The Commissioner expects complete and accurate copies and will normally require submission of original documents only in exceptional cases. This general rule does not apply to affidavits, for which original documents should be submitted.

Although the Commissioner is not bound by the formal rules of evidence, he will still expect parties to provide information based on first-hand knowledge, as opposed to information they have gathered from other sources.

Oral testimony

In an oral inquiry, the Commissioner may hear the oral testimony of witnesses given under oath. Parties to an inquiry should ensure that witnesses are available to answer questions about their personal knowledge of the case.

A person giving oral testimony under oath will need to swear or affirm before the Commissioner that the evidence he or she is giving is the truth. There are serious legal consequences for a person who gives false testimony under oath.

Affidavit evidence

An affidavit is a voluntary declaration of facts written down and sworn or affirmed to be true by a party who has personal knowledge of the records or matters at issue in an inquiry. An affidavit must be sworn before a Commissioner for Oaths or a Notary Public. There are serious legal consequences for a person who swears a false affidavit.

Affidavits are used in a written inquiry, where there is no hearing. Affidavits may also be used in support of oral testimony at a hearing. If an affidavit is submitted as evidence in an oral inquiry, the person who has sworn the affidavit should be prepared to attend the inquiry to be questioned by the Commissioner, or the other parties, on the information contained in the affidavit.

A party is almost always free to decide whether or not it wishes to submit affidavit evidence – with one notable exception. If the Commissioner orders the production of a record under **section 56** of the FOIP Act, and a party claims that it cannot produce the record because to do so would be an offence under an Act of Canada (e.g. the *Youth Criminal Justice Act*), the Commissioner will require the party to produce an affidavit to that effect (*IPC Order 96-015*).

In certain situations the Commissioner may accept a statutory declaration rather than an affidavit (*IPC Order 99-021*). However, the Commissioner has stated that affidavit evidence is preferred (FOIP Practice Note 10: *Public Bodies' Evidence and Arguments for Inquiries*).

Currency

This Bulletin takes into consideration decisions issued by the Office of the Information and Privacy Commissioner of Alberta up to October 31, 2009.

Purpose

FOIP Bulletins are intended to provide FOIP Coordinators with more detailed information for interpreting the *Freedom of Information and Protection of Privacy Act*. They supply information concerning procedures and practices to assist in the effective and consistent implementation of the FOIP Act across public bodies. FOIP Bulletins are not a substitute for legal advice.

Further Information

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