

Anonymizing Identity of Applicants

ATIPP Office

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Background

In order to ensure the focus of a response to an access to information request made under the *Access to Information and Protection of Privacy Act, 2015* is on the merit of the request, as opposed to the identity or type of applicant, and that each request is handled in an impartial, fair and principles manner, section 12 of the Act requires that the identity of an applicant be protected throughout the request process.

Specifically, when a department or public body receives an access to information request, the identity of the applicant should be anonymized before they leave the hands of the coordinator, and continue until the final response is sent to the applicant by the ATIPP coordinator.

- For All ATIPP requests, coordinators must anonymize the identity (name) and type of applicant.
- In instances where ATIPP coordinators must consult with others within the department (i.e., subject experts, employees who must search for responsive records), the ATIPP coordinator should only provide the wording of the request, not who the applicant is or the type of applicant (e.g. media, political party, individual, etc.).
- The only exception to the rule can be made if the request is for personal information and other employees must know the applicant's name in order to search for responsive records or where the name of the applicant is necessary in order to respond to the request and the applicant has consented to the disclosure of their name.
- Where the name of the applicant must be disclosed as set out above, it must only be disclosed insofar as it necessary to respond to the request.
- The Office of Public Engagement will collect information about the type of applicant after the final response has been provided to the applicant, for

reporting and statistical purposes

Disclosure of Identity

The disclosure of the name and type of applicant is only permitted to be disclosed to the individual who receives the request on behalf of the public body, the ATIPP coordinator, the coordinator's assistant and, where necessary, the Information and Privacy Commissioner. This limitation of disclosure applies until the final response is sent to the applicant.

Exception

In the case of requests for personal information or where the identity of the applicant is necessary to respond to the request, the ATIPP Coordinator can disclose the identity of the applicant. The disclosure of such information should be limited to only those individuals who need to know in order to search for any responsive records or that need to be consulted on the request.