



Indian and Northern  
Affairs Canada

Affaires indiennes  
et du Nord Canada

# **Annual Report to Parliament**

## **Access to Information Act**

**and**

## **Privacy Act**

**2004 - 2005**



Canada



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# ***Access to Information Act***



## **INTRODUCTION**

The purpose of the *Access to Information Act*, proclaimed in July 1983, is “to extend the present laws of Canada to provide a right of access to information in records under the control of a government institution” (section 2) to Canadians, permanent residents and anyone living in Canada. The principles underlying this legislation are:

- government information should be available to the public;
- necessary exceptions to the right of access should be limited and specific;
- the Act is not meant to replace existing means of providing information; and
- decisions on the disclosure of government information should be reviewed independently of government.

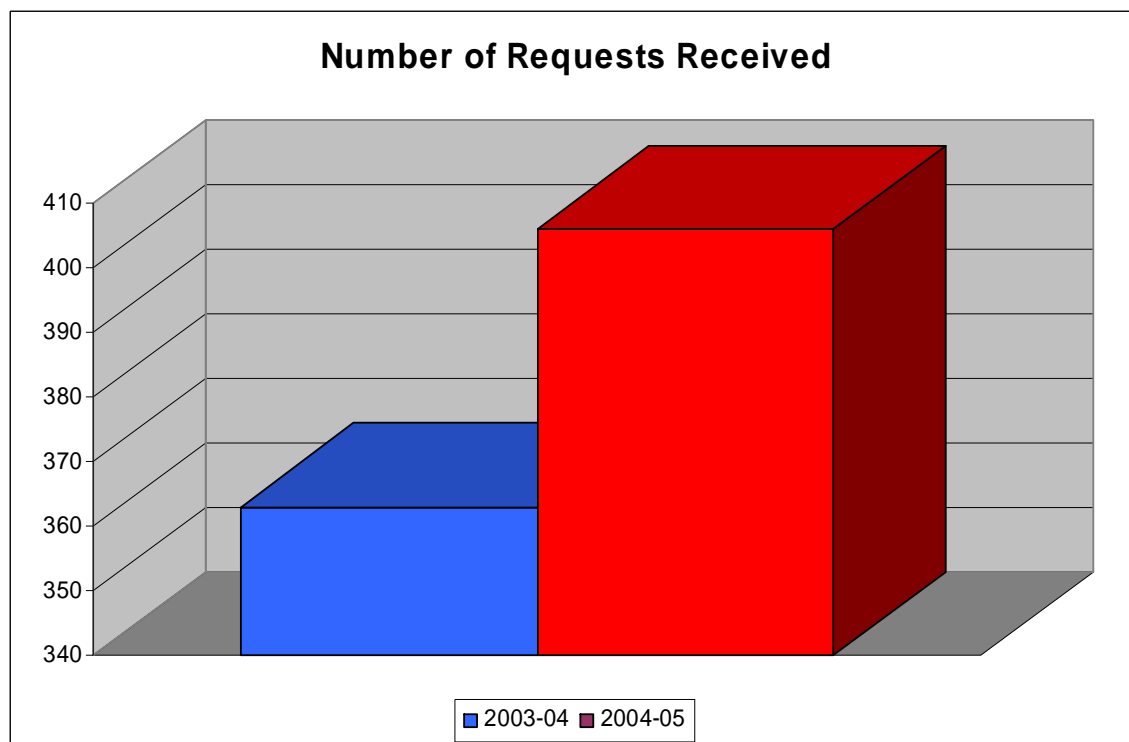
This Annual Report to Parliament is for the 2004-2005 fiscal year, as required under subsections 72(1) and 72(2) of the *Access to Information Act*.

## **DELEGATED AUTHORITIES**

Under Section 73 of the *Access to Information Act*, the Minister’s authority is delegated to enable the Department to meet the requirements of the Act and exercise its powers. Responsibility for all sections of the Act has been delegated to the Corporate Secretary, Office of the Corporate Secretariat and to the Departmental Access to Information and Privacy Coordinator.

## **HIGHLIGHTS**

Between April 1, 2004 and March 31, 2005 the department received 406 requests for information under the *Access to Information Act* (see Figure 1). This represented a 12% increase over the previous reporting period and a continuation of the trend toward gradual increases. Along with the 406 new requests received, 48 requests were carried over from the previous fiscal year, for a total of 454 requests. During the reporting period, 400 requests were completed; 54 will be carried over to the next reporting period. The Department continues to be committed to improving timeliness in responding to requests. In 2003-2004, responses were provided within the legislated time frame in 92.4% of cases. In the 2004-2005 reporting period, the response rate increased to 94.25%.



**Figure 1**

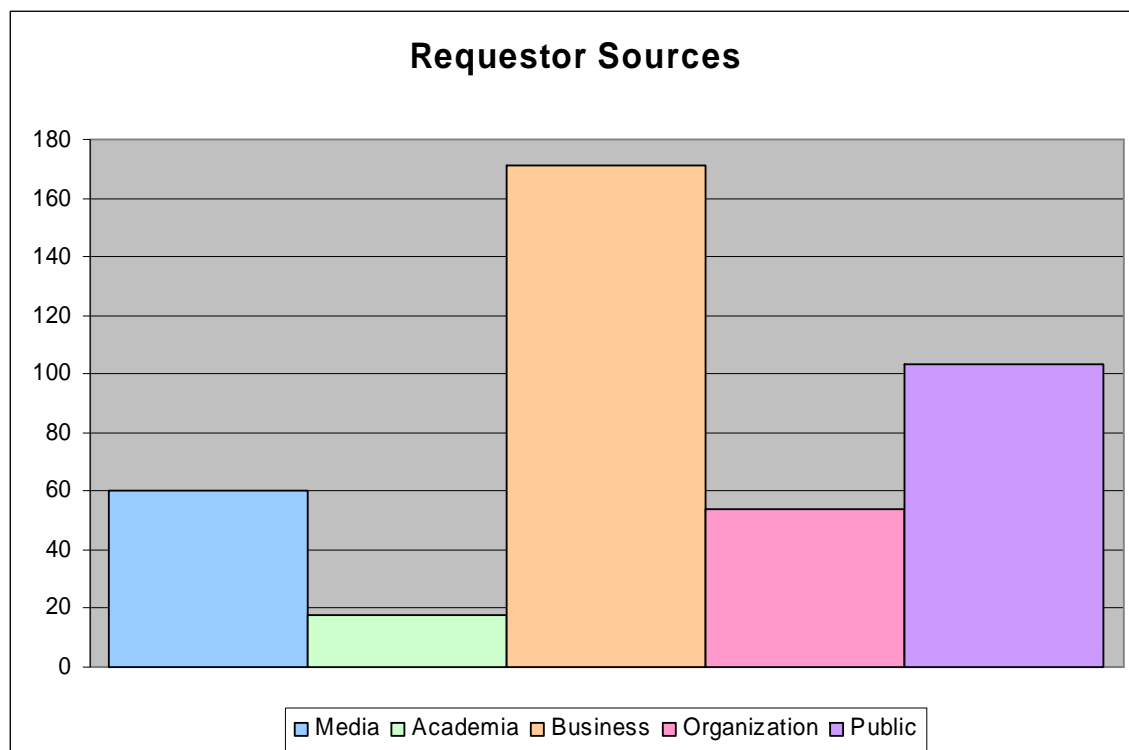
In fiscal year 2004-2005, the Access to Information and Privacy unit processed all new requests using ATIPimage, a database enabling requests to be processed electronically. This significantly reduced the amount of paper used in the units. All responsive records are scanned into the database, making it possible to review and sever records on screen. With this software, the unit was able to process requests more efficiently and provide requestors the option of receiving their response packages on CD-Rom, thereby saving photocopy fees. Since all files are now stored on CD-Rom, less physical space is required for file storage. We have noticed a significant increase in the number of requestors choosing to be provided with the release package on CD format.

## ***REQUESTOR SOURCES***

The Access to Information requests received during this reporting period break down as follows (see Figure 2):

- Media 60
- Academia 18
- Business 171
- Organization 54
- Public 103





**Figure 2**

## ***DISPOSITION OF COMPLETED REQUESTS***

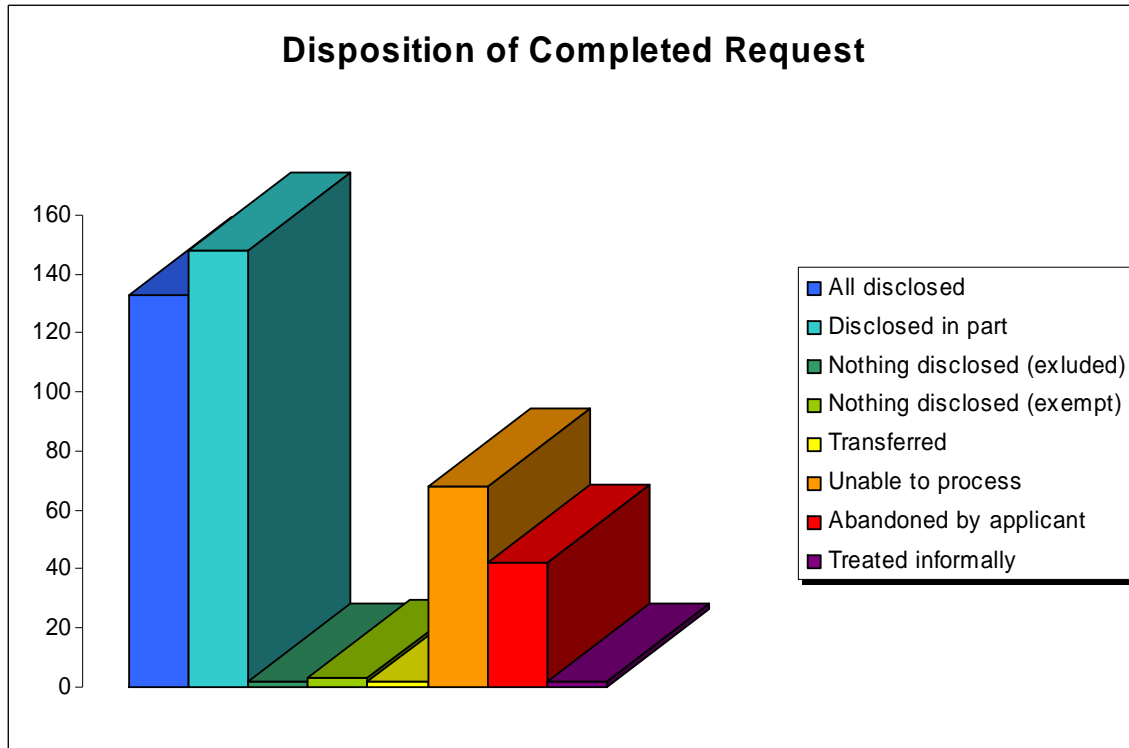
The distribution of completed request is as follows (see Figure 3):

- All Disclosed 133 (33.25%)
- Disclosed in Part 148 (37%)
- Nothing Disclosed (Excluded) 2 (0.5%)
- Nothing Disclosed (Exempt) 3 (0.75%)
- Transferred 2 (0.5%)
- Unable to Process<sup>1</sup> 68 (17%)
- Abandoned by the Applicant 42 (10.5%)
- Treated Informally 2 (0.5%)

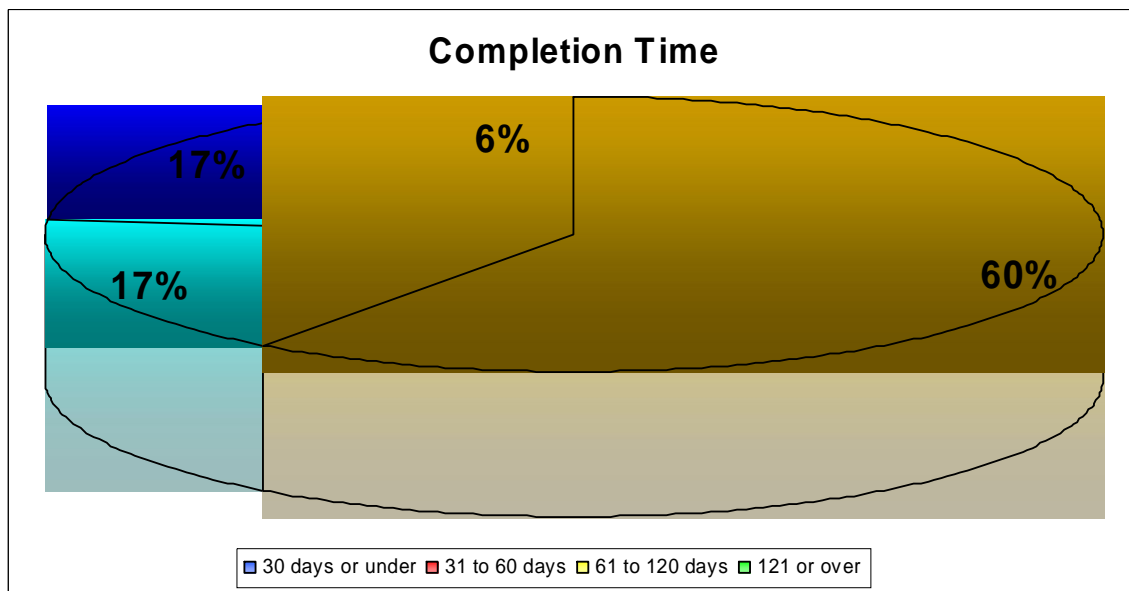
**TOTAL COMPLETED**

**400**

<sup>1</sup> There are no records that respond to the request.



**Figure 3**



**Figure 4**

## FEES AND COSTS

Fees are calculated in accordance with provisions of the *Access to Information Act* and attendant regulations. A \$5.00 application fee is charged for processing a request. The first five hours of processing the request are free of charge. Any further time is charged at a rate of \$10.00 per hour. A photocopy fee of \$0.20 per page is charged if more than 125 pages must be copied. However, requestors have the option of receiving records on a CD-ROM without charge. Fees may be waived at the discretion of the Department. For the reporting period, the Department collected \$6,004.00 in fees, and waived \$15,267.00 in fees<sup>2</sup>.

## CONSULTATIONS WITH OTHER INSTITUTIONS

When a request contains records that are of a greater interest to another institution, the Access to Information and Privacy Coordinator of that institution is consulted. Indian and Northern Affairs Canada was consulted in 114 cases in the reporting period. In turn, the Department initiated 465 consultations with other government departments and third parties as a result of 135 requests for information. For the 114 cases in which the Department was consulted, the Access to Information and Privacy unit reviewed 4,403 pages and agreed to release 4,032 pages (see Figure 5).

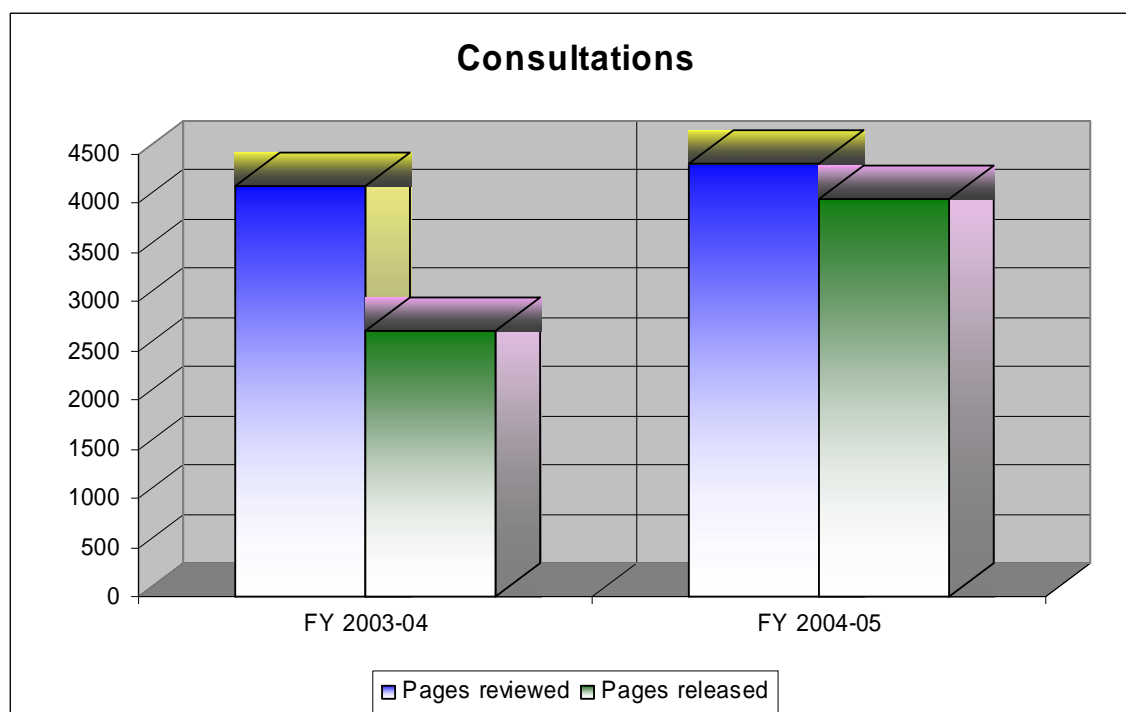


Figure 5

<sup>2</sup> Reproduction fees waived when releasing records electronically on CD-ROM.

## **COMPLAINTS AND INVESTIGATIONS**

To ensure that federal institutions fully comply with the Act, and that all requestors are treated fairly and consistently, sections 41 to 53 of the *Access to Information Act* provide for a two-tiered system of review of decisions made under the Act. The first level is a formal complaint to the Information Commissioner of Canada and the second level is an appeal to the Federal Court.

During the reporting period, 25 complaints against the Department were filed with the Information Commissioner of Canada. To deal with these, 12 investigations were completed; 13 will be carried over to the next reporting period. Of the 12 completed investigations, the Information Commissioner of Canada found that five complaints were not substantiated and six were resolved to the satisfaction of the requestor. One complaint was found to be well founded.

The Department received one appeal from the Federal Court during this report period. The appeal was withdrawn.



REPORT ON THE ACCESS TO INFORMATION ACT  
RAPPORT CONCERNANT LA LOI SUR L'ACCÈS À L'INFORMATION

Institution Indian and Northern Affairs Canada / Affaires indiennes et du Nord Canada				Reporting period / Période visée par le rapport 04/01/2004 to / à 03/31/2005	
Source	Media / Médias 60	Academia / Secteur universitaire 18	Business / Secteur commercial 171	Organization / Organisme 54	Public 103

**I Requests under the Access to Information Act /  
Demandes en vertu de la Loi sur l'accès à l'information**

Received during reporting period / Reçues pendant la période visée par le rapport	406
Outstanding from previous period / En suspens depuis la période antérieure	48
<b>TOTAL</b>	<b>454</b>
Completed during reporting period / Traitées pendant la période visées par le rapport	400
Carried forward / Reportées	54

**II Disposition of requests completed /  
Disposition à l'égard des demandes traitées**

1. All disclosed / Communication totale	133	6. Unable to process / Traitement impossible	68
2. Disclosed in part / Communication partielle	148	7. Abandoned by applicant / Abandon de la demande	42
3. Nothing disclosed (excluded) / Aucune communication (exclusion)	2	8. Treated informally / Traitement non officiel	2
4. Nothing disclosed (exempt) / Aucune communication (exemption)	3	<b>TOTAL</b>	<b>400</b>
5. Transferred / Transmission	2		

**III Exemptions invoked /  
Exceptions invoquées**

S. Art. 13(1)(a)	2	S. Art. 16(1)(a)	4	S. Art. 18(b)	0	S. Art. 21(1)(a)	64
(b)	1	(b)	2	(c)	0	(b)	47
(c)	17	(c)	6	(d)	11	(c)	60
(d)	1	(d)	0	S. Art. 19(1)	122	(d)	6
S. Art. 14	20	S. Art. 16(2)	2	S. Art. 20(1)(a)	1	S. Art. 22	2
S. 15(1) International rel. / Art. Relations interm.	0	S. Art. 16(3)	0	(b)	77	S. Art. 23	57
Defence / Défense	2	S. Art. 17	4	(c)	34	S. Art. 24	2
Subversive activities / Activités subversives	0	S. Art. 18(a)	7	(d)	39	S. Art. 26	0

**IV Exclusions cited /  
Exclusions citées**

S. Art. 68(a)	2	S. Art. 69(1)(c)	4
(b)	0	(d)	6
(c)	0	(e)	9
S. Art. 69(1)(a)	10	(f)	1
(b)	0	(g)	32

**V Completion time /  
Délai de traitement**

30 days or under / 30 jours ou moins	240
31 to 60 days / De 31 à 60 jours	67
61 to 120 days / De 61 à 120 jours	69
121 days or over / 121 jours ou plus	24

**VI Extensions /  
Prorogations des délais**

	30 days or under / 30 jours ou moins	31 days or over / 31 jours ou plus
Searching / Recherche	55	22
Consultation	45	29
Third party / Tiers	0	77
<b>TOTAL</b>	<b>100</b>	<b>128</b>

**VII Translations /  
Traduction**

Translations requested / Traductions demandées		0
Translations prepared / Traductions préparées	English to French / De l'anglais au français	0
	French to English / Du français à l'anglais	0

**VIII Method of access /  
Méthode de consultation**

Copies given / Copies de l'original	271
Examination / Examen de l'original	2
Copies and examination / Copies et examen	8

**IX Fees /  
Frais**

Net fees collected / Frais net perçus			
Application fees / Frais de la demande	\$1,995.00	Preparation / Préparation	\$0.00
Reproduction	\$932.40	Computer processing / Traitement informatique	\$0.00
Searching / Recherche	\$3,0076.60	<b>TOTAL</b>	<b>\$6,004.00</b>
Fees waived / Dispense de frais		No. of times / Nombre de fois	\$
\$25.00 or under / 25 \$ ou moins		97	<b>\$641.60</b>
Over \$25.00 / De plus de 25 \$		76	<b>\$14,625.40</b>

**X Costs  
Coûts**

Financial (all reasons) / Financiers (raisons)	
Salary / Traitement	<b>\$438,646.69</b>
Administration (O and M) / Administration (fonctionnement et maintien)	<b>\$83,967.94</b>
<b>TOTAL</b>	<b>\$522,614.63</b>
Person year utilization (all reasons) / Années-personnes utilisées (raison)	
Person year (decimal format) / Années-personnes (nombre décimal)	<b>7.99</b>





# ***Privacy Act***





## **INTRODUCTION**

The purpose of the *Privacy Act*, proclaimed in July 1983, is “to extend the present laws of Canada that protect the privacy of individuals with respect to personal information about themselves held by a government institution and that provide individuals with a right of access to that information”. (Section 2)

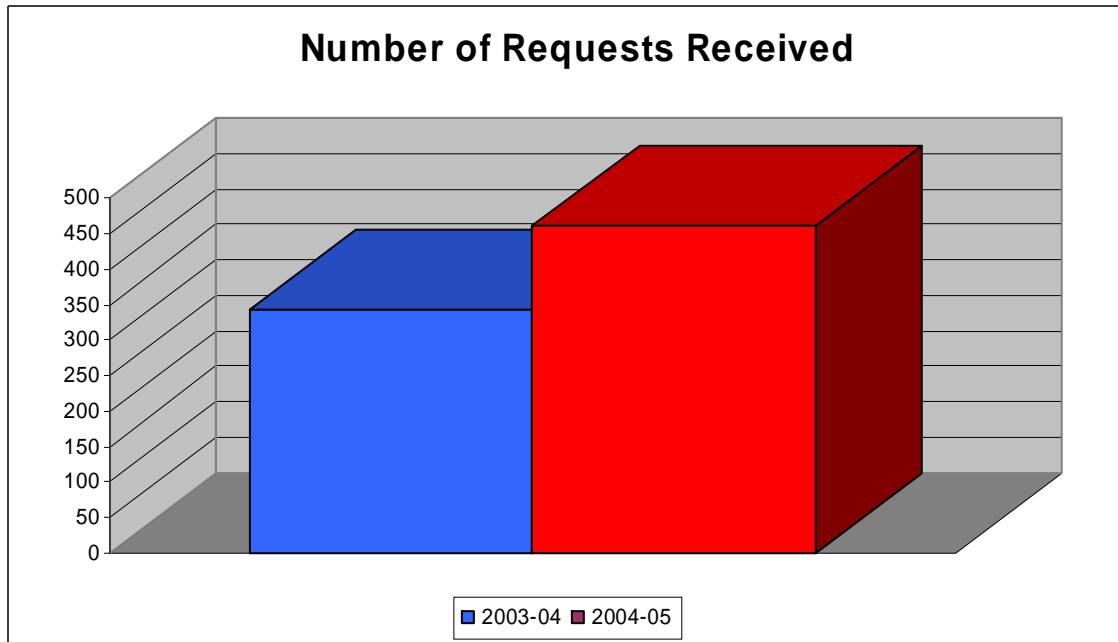
This Annual Report to Parliament is for the fiscal year 2004-2005, as required under subsections 72(1) and 72(2) of the *Privacy Act*.

## **DELEGATED AUTHORITIES**

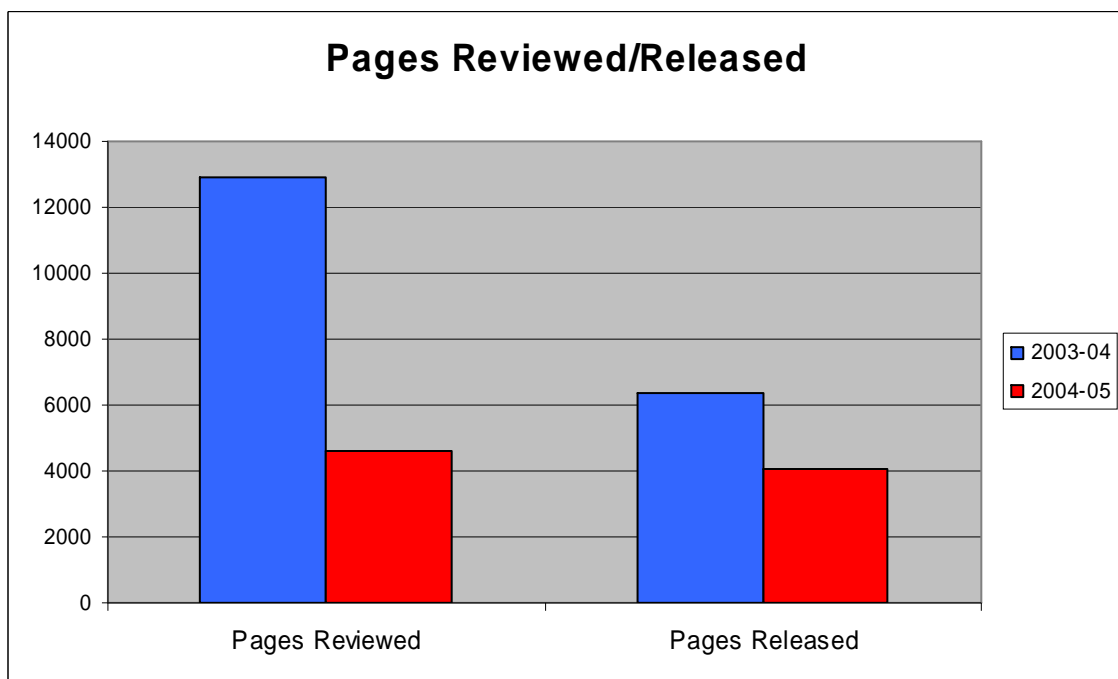
Under section 73 of the *Privacy Act*, the Minister’s authority is delegated to enable the Department to meet its legislated requirements and exercise its powers. Responsibility for all sections of the Act has been delegated to the Corporate Secretary, Office of the Corporate Secretariat, and to the departmental Access to Information and Privacy Coordinator.

## **HIGHLIGHTS**

Between April 1, 2004 and March 31, 2005, the Department received 461 requests for information under the *Privacy Act* (see Figure 1). In addition, five requests were carried over from the previous fiscal year, for a total of 466 requests. During the reporting period, 448 requests were processed and 18 will be carried over to the next reporting period. The most common types of requests were for records that related to registration issues, staff relations, federal day schools and Indian residential schools. While processing the 448 completed requests, 4,592 pages of records were reviewed; of those, 4,035 pages were released (see Figure 2).



**Figure 1**

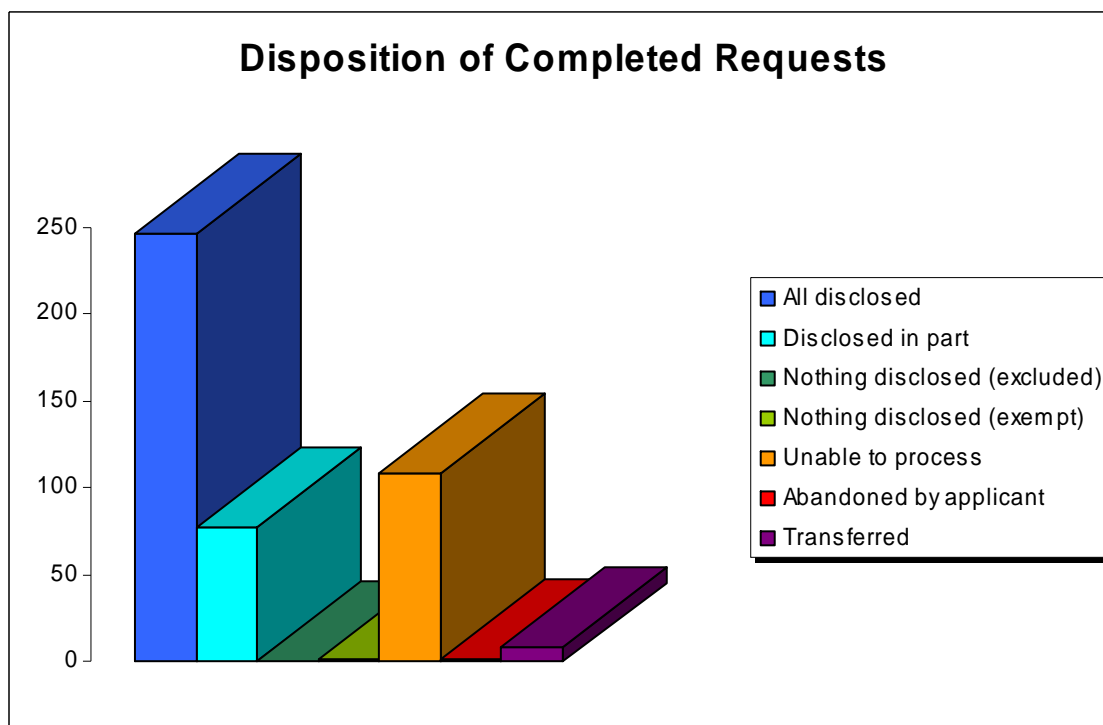


**Figure 2**

## ***DISPOSITION OF COMPLETED REQUESTS***

The distribution of completed request is as follows (see Figure 3):

- All Disclosed 247 (55.1%)
- Disclosed in Part 78 (17.4%)
- Nothing Disclosed (Excluded) 1 (0.2%)
- Nothing Disclosed (Exempt) 2 (0.4%)
- Unable to Process<sup>3</sup> 109 (24.3%)
- Abandoned by the Applicant 2 (0.4%)
- Transferred 9 (2.0%)



**Figure 3**

## ***DISCLOSURE OF PERSONAL INFORMATION***

Subsection 8(2) of the *Privacy Act* states that “*personal information under the control of a government institution may be disclosed*” under certain specific circumstances.

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<sup>3</sup> There are no records that respond to the request.

#### **Paragraph 8(2)(a)**

Personal information may be disclosed “*for the purpose for which the information was obtained or compiled by the institution or for a use consistent with that purpose.*”

Under this paragraph of the *Privacy Act*, two requests were received and processed.

#### **Paragraph 8(2)(b)**

Personal information may be disclosed “*for any purpose in accordance with any Act of Parliament or any regulation made thereunder that authorizes its disclosure.*”

Under this paragraph of the *Privacy Act*, 93 requests were received, 92 were processed, and one will be carried forward. All pertained to paragraph 19(1) of the *Immigration and Refugee Protection Act*.

#### **Paragraph 8(2)(c)**

Personal information may be disclosed “*for the purpose of complying with a subpoena or warrant issued or order made by a court, person or body with jurisdiction to compel the production of information or for the purpose of complying with rules of court relating to the production of information.*”

Under this paragraph of the *Privacy Act*, three requests were received and processed. All pertained to court cases involving federal day schools.

#### **Paragraph 8(2)(d)**

Personal information may be disclosed “*to the Attorney General of Canada for use in legal proceedings involving the Crown in right of Canada or the Government of Canada.*”

Under this paragraph of the *Privacy Act*, 54 requests were received, 53 were processed, and one will be carried forward.

#### **Paragraph 8(2)(e)**

Personal information may be disclosed “*to an investigative body [...]. for the purpose of enforcing any law of Canada or a province or carrying out a lawful investigation...*”

Under this paragraph of the *Privacy Act*, 10 requests were received and processed.

#### **Paragraph 8(2)(f)**

Personal information may be disclosed “*under an agreement or arrangement between the Government of Canada [...] and the government of a province [or territory] [...] for the purpose of administering or enforcing any law or carrying out a lawful investigation.*”

Under this paragraph of the *Privacy Act*, 90 requests were received and processed.

#### **Paragraph 8(2)(k)**

Personal information may be disclosed “*to any association of aboriginal people, Indian band, government institution or part thereof, or to any person acting on behalf of such association, band, institution or part thereof, for the purpose of researching or validating the claims, disputes or grievances of any of the aboriginal peoples of Canada.*”

Under this paragraph of the *Privacy Act*, 12 requests were received and processed.

#### **Sub-paragraph 8(2)(m)(ii)**

Personal information may be disclosed “*for any purpose where, in the opinion of the head of the institution, disclosure would clearly benefit the individual to whom the information relates.*”

Under this sub-paragraph of the *Privacy Act*, two requests were received and processed.

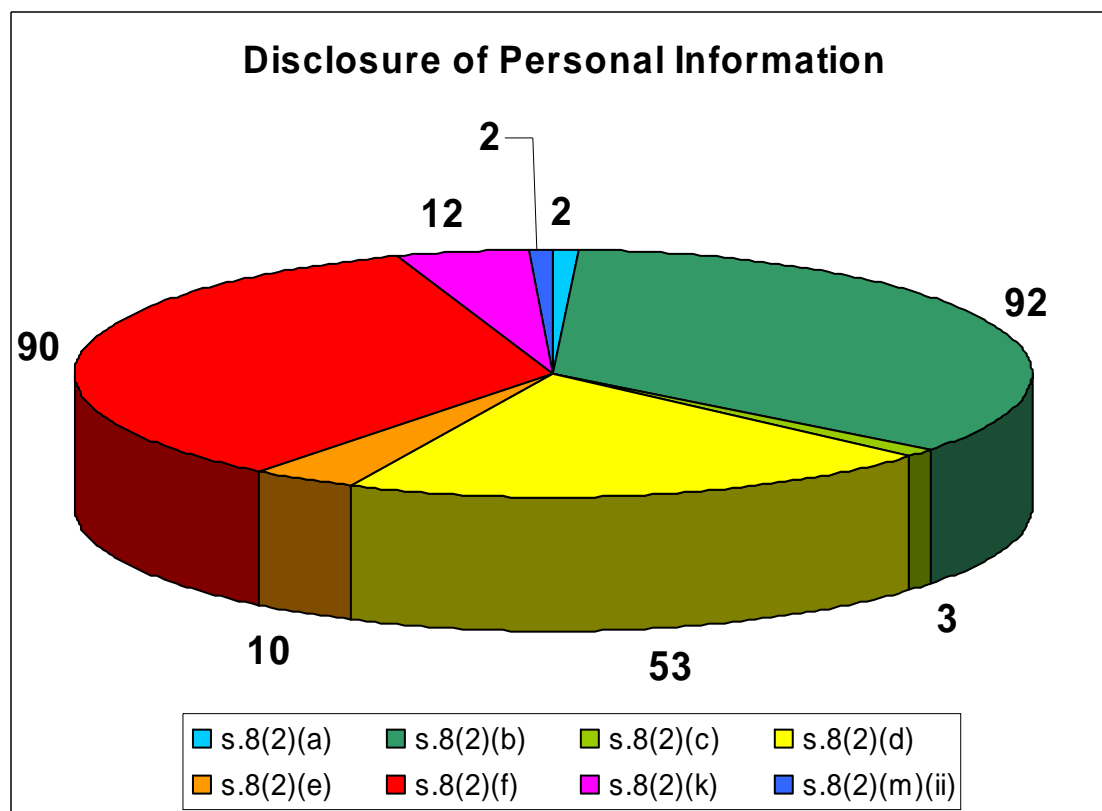


Figure 4

## COMPLAINTS AND INVESTIGATIONS

To ensure that federal institutions fully comply with the Act, and that all requestors are treated fairly and consistently, section 29 and sections 41 through 52 of the *Privacy Act* provide for a two-tiered system of review of decisions made under the Act. The first level is a formal complaint to the Privacy Commissioner of Canada and the second level is an appeal to the Federal Court.

During fiscal year 2004-2005, no complaints were filed with the Privacy Commissioner of Canada, against the Department, in relation to the processing of requests made under the Act. However, three complaints were filed with the Privacy Commissioner of Canada against the Department pertaining to infringement of privacy rights. One of these has been resolved to the satisfaction of the complainant. The two remaining complaints are ongoing.



REPORT ON THE PRIVACY ACT  
RAPPORT CONCERNANT LA LOI SUR LA PROTECTION  
DES RENSEIGNEMENTS PERSONNELS

Institution	Indian and Northern Affairs Canada / Affaires indiennes et du Nord Canada	Reporting period / Période visée par le rapport 04/01/2004 to / à 03/31/2005
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<b>I Requests under the Privacy Act / Demandes en vertu de la Loi sur la protection des renseignements personnels</b>		
Received during reporting period / Reçues pendant la période visée par le rapport		461
Outstanding from previous period / En suspens depuis la période antérieure		5
<b>TOTAL</b>		466
Completed during reporting period / Traitées pendant la période visées par le rapport		448
Carried forward / Reportées		18

<b>II Disposition of request completed / Disposition à l'égard des demandes traitées</b>		
1. All disclosed / Communication totale		247
2. Disclosed in part / Communication partielle		78
3. Nothing disclosed (excluded) / Aucune communication (exclusion)		1
4. Nothing disclosed (exempt) / Aucune communication (exemption)		2
5. Unable to process / Traitement impossible		109
6. Abandoned by applicant / Abandon de la demande		2
7. Transferred / Transmission		9
<b>TOTAL</b>		448

<b>III Exemptions invoked / Exceptions invoquées</b>		
S. Art. 18(2)		0
S. Art. 19(1)(a)		1
(b)		0
(c)		1
(d)		0
S. Art. 20		0
S. Art. 21		0
S. Art. 22(1)(a)		0
(b)		0
(c)		0
S. Art. 22(2)		0
S. Art. 23 (a)		0
(b)		0
S. Art. 24		0
S. Art. 25		0
S. Art. 26		9
S. Art. 27		0
S. Art. 28		0

<b>IV Exclusions cited / Exclusions citées</b>		
S. Art. 69(1)(a)		0
(b)		0
S. Art. 70(1)(a)		0
(b)		0
(c)		0
(d)		0
(e)		0
(f)		0

<b>V Completion time / Délai de traitement</b>		
30 days or under / 30 jours ou moins		412
31 to 60 days / De 31 à 60 jours		34
61 to 120 days / De 61 à 120 jours		2
121 days or over / 121 jours ou plus		0

<b>VI Extensions / Prorogations des délais</b>			
	30 days or under / 30 jours ou moins	31 days or over / 31 jours ou plus	
Interference with operations / Interruption des opérations	0	0	
Consultation	0	0	
Translation / Traduction	0	0	
<b>TOTAL</b>	0	0	

<b>VII Translations / Traductions</b>			
Translations requested / Traductions demandées			0
Translations prepared / Traductions préparées	English to French / De l'anglais au français		0
	French to English / Du français à l'anglais		0

<b>VIII Method of access / Méthode de consultation</b>		
Copies given / Copies de l'original		103
Examination / Examen de l'original		47
Copies and examination / Copies et examen		2

<b>IX Corrections and notation / Corrections et mention</b>		
Corrections requested / Corrections demandées		0
Corrections made / Corrections effectuées		0
Notation attached / Mention annexée		0

<b>X Costs / Coûts</b>			
Financial (all reasons) / Financiers (raisons)			
Salary / Traitement	\$	\$505,541.31	
Administration (O and M) / Administration (fonctionnement et	\$	\$96,773.06	
<b>TOTAL</b>	\$	\$602,314.37	
Person year utilization (all reasons) / Années-personnes utilisées (raisons)			
Person year (decimal format) / Années-personnes (nombre décimal)			9.21







# ***Administration of Personal Information***



## **PRIVACY IMPACT ASSESSMENTS**

The Privacy Policy division of the Access to Information and Privacy (ATIP) unit has been instrumental in making the Privacy Impact Assessment (PIA) process a focal point for privacy activities at Indian and Northern Affairs Canada (INAC). By providing advice and guidance, including written and oral training, the Privacy Policy division has enabled all INAC program offices to incorporate privacy into their fundamental program planning. Although the PIA policy is still relatively recent, the PIA process is becoming firmly embedded in our Department. The creation of a departmental Privacy Committee, whose members consist of senior management, will assist in ensuring the PIA policy is communicated and adhered to within INAC. From the initiation of a PIA to the final product, the Privacy Policy division has provided PIA direction to program offices and its components.

A PIA outlines salient points about new or existing personal information, including hard copy format or through technology systems, by answering questions about the information that will be collected, who will be able to access the information, how the information and data will be maintained, what administrative controls will be in place, and how the decision to use the information was made.

The Privacy Policy division has provided critical privacy advice to new initiatives, resulting in changes that will improve privacy protection in departmental programs. Procedures are being established to ensure that privacy is considered throughout the life cycle of INAC's processes and programs and that fair information principles inform policy decisions concerning data collection and use.

In this past fiscal year, INAC completed one PIA, initiated two PIAs and initiated two preliminary PIAs.

### **National Post-Secondary Education System (NPSES): (PIA completed)**

Indian and Northern Affairs Canada (INAC), through its Post-Secondary Education (PSE) Program, promotes the post-secondary education of Indians and Inuit. The National Post-Secondary Education System (NPSES) will automate and streamline the post-secondary education update process; it provides a system that Administering Organizations can use to better update and access their own information and to improve management of their respective post-secondary education programs.

## **PeopleSoft Human Resources Management Information System (HRMIS): (PIA initiated)**

The PeopleSoft Human Resources Management Information System (HRMIS) is a national system that provides direct access to Human Resource information in support of operational activities, via client-server technology and intranet/internet technology. The scope of this PIA defines both client/server and web-based technology presently used, and the development and implementation of a total web-based architecture.

HRMIS is comprised of two components. The first allows Human Resource professionals to access the system via a client/server technology to administer HR functions. Information captured for this purpose includes benefits programs and benefits claims, career plans, certifications, considerations for promotion/transfer, dependants, discipline, education, employment equity, grievances, health and safety and accident reporting, language skills, leave and leave entitlements, posting data, public complaints, salary information, security/reliability clearances, skills, superannuation, tests and training courses. The second is a HR On-line component accessed via an intranet/internet technology by all employees and provides web-based access to Leave Self Service, Employee Self Service and Manager Self Service.

## **FNDBMS (First Nations Database Management System); RRTMS (Regional Report Tracking Management System); and, Management dashboards (MDBs): (PIA initiated)**

Indian and Northern Affairs Canada (INAC), Quebec Region, has developed three software applications for managing and supporting educational and social services initiatives. These applications are: FNDBMS (First Nations Database Management System); RRTMS (Regional Report Tracking Management System); and, Management dashboards (MDBs).

The software applications collect three different types of personal information:

1. Data to establish eligibility for a program;
2. Data, such as statistics, for assessing program effectiveness;
3. Data only for the *Institut Culturel et Éducatif Montagnais* [Montagnais educational and cultural institute] in relation to personalized progress monitoring of certain students.

## **Collaboration: (Preliminary PIA initiated)**

The Collaboration software will be implemented as a single service for all of INAC. It will interface transparently with all regional Comprehensive Integrated Document Management (CIDM) libraries. In this way, the Collaboration platform will enable authorized users from across the country to share documents regardless of what CIDM

library they have access to. The system will be implemented as a standard tool for internal INAC users as well as for users external to INAC such as representatives of First Nations, other federal government institutions, provincial/territorial governments, and other external parties who need to collaborate with the Department. Collaboration provides teams of internal and external participants with a work environment that resembles a boardroom. People participate and contribute through discussion forums, documents and comments. They contribute when they want and in the language of their choice. All of these participation vehicles allow participants to freely enter text of their choosing. There are no facilities within the Collaboration system to restrict the content entered by participants. However, the system does allow a designated moderator to review and delete inappropriate contributions.

### **WebCIMS: (Preliminary PIA initiated)**

WebCIMS is a Web-based Case and Issues Management System evaluated and adopted by Treasury Board Secretariat (TBS) as part of the Federal Government Shared Systems Initiative. INAC has adopted WebCIMS for the Minister's CIMS. The Corporate Secretariat sponsors WebCIMS to manage correspondence to the Minister, Minister of State, Parliamentary Secretary to the Minister, Deputy Minister, Associate Deputy Ministers and Assistant Deputy Ministers.

### ***Memoranda of Understanding***

Memoranda of Understanding (MOU) initiated with INAC and other institutions for the disclosure of personal information have been significant in the past few years. INAC initiated three agreements in fiscal year 2004-2005. These MOUs entail extensive negotiations to ensure the agreements contain the necessary privacy clauses to protect the personal information being disclosed.

The following is a description of each MOU initiated in the past fiscal year.

### **Yukon Post-Secondary Education Records Transfer/First Nation:**

This MOU relates to the transfer of Post-Secondary Records from the Yukon Region to administering First Nations agents.

## **Integrated Social Assistance System:**

This MOU relates to the Integrated Social Assistance System requirement in INAC's Manitoba regional office to obtain a download of the IRS for look-up purposes to validate social assistance dollars given to the First Nations.

## **Office of the Federal Interlocutor:**

This MOU relates to the transfer of records from the Office of the Federal Interlocutor (Privy Council Office) to INAC.

## ***Departmental Privacy Review***

In the past fiscal year, INAC completed a Privacy Review of its personal information holdings. This review was undertaken by a consulting firm. The purpose of this review of personal information holdings and related processes was to ascertain the level of risk to the personal information over its life cycle and, as appropriate, to identify and recommend measures to mitigate these risks. The focus of this privacy review was the Department's holdings of personal information belonging to program participants. The review was conducted in two phases. The initial phase focused on Headquarters activity.

The objectives of Phase I were to:

1. Identify the extent of INAC personal information holdings;
2. Assess the practices in place to manage/secure personal information;
3. Assess INAC staff familiarity with the *Privacy Act*, training received, the adequacy of training and awareness of Privacy Impact Assessment requirements;
4. Identify potential areas of concern; and
5. Provide feedback on next steps including an action plan, priorities and resource requirements as part mitigating INAC risk/exposure.

The objectives of Phase II were to:

1. Identify potential privacy issues stemming from regional activity;
2. Compare/contrast these findings with the privacy observations from the Headquarters privacy review; and
3. Validate/build on next steps recommended in Phase I.

Initiatives have been undertaken to implement the recommendations cited in the Review.

Indian and Northern Affairs Canada remains committed to formulating, developing, implementing, and promoting effective individual privacy protection strategies and programs. These strategies and programs will enhance the efforts of the department to earn the highest degree of confidence by its employees and stakeholders.