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## Corporate Secretariat

October 2009

# Annual Report on the Administration of the *Access to Information Act* within Human Resources and Skills Development Canada 2008-2009

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# Introduction

This is the fourth annual report on the administration of the *Access to Information Act* within Human Resources and Skills Development Canada (HRSDC), in accordance with section 72 of the Act. It covers the period April 1, 2008, to March 31, 2009.

The purpose of the *Access to Information Act*, as stated in subsection 2(1), 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 in accordance with the principles that government information should be available to the public, that necessary exceptions to the right of access should be limited and specific and that decisions on the disclosure of government information should be reviewed independently of government.” This report includes a narrative on the processing of formal requests submitted to the Department. It also highlights the administration of this statute and statistics on the period’s activities.

The report deals with the administration of the *Access to Information Act* at HRSDC (including Service Canada and the Labour Program). In July 2008, the Department’s two offices charged with administering access to information and privacy legislation, namely the former Human Resources and Social Development’s “Access to Information and Privacy Directorate” and Service Canada’s “Access to Information and Privacy, Privacy Policy, and Human Rights Division,” were integrated. Following the merge and subsequent restructuring, the newly formed Access to Information and Privacy Division includes about 40 employees. The division is led by a Director reporting directly to HRSDC’s Corporate Secretary. The Director is supported by three managers, each responsible for the following sections:

- **The Operations Section:** This section is responsible for processing requests under the *Access to Information Act* and the *Privacy Act*. This includes performing a line-by-line review of records requested under this legislation and, for requests under the *Access to Information Act*, preparing and distributing weekly reports and briefings to interested parties within the Department. The section is also the main point of contact with the Office of the Information Commissioner of Canada and with the Office of the Privacy Commissioner of Canada, for dealing with complaints about how access to information and privacy requests are handled. The Operations section is charged with preparing and delivering training and awareness sessions throughout the Department. Finally, the section coordinates the Department’s annual reporting requirements and HRSDC’s input into the Treasury Board of Canada Secretariat’s annual update of its *Info Source* publication. The majority of *Privacy Act* requests are processed by employees within HRSDC’s regions, and all requests submitted under the *Access to Information Act* are processed at National Headquarters by the Operations Section.
- **The Privacy Policy Management Section:** This section provides policy advice and guidance on handling personal information (including the interpretation of the Department’s privacy codes) to officials of HRSDC across its portfolios. It is also responsible for assisting program officials when they draft information sharing agreements to ensure that the applicable privacy laws are respected. The section provides advice to departmental officials on preparing Privacy Impact Assessments, responds to legal instruments in which the Department is asked to share personal information (i.e., subpoenas, court orders, search warrants), and acts as the main liaison with the Office of the Privacy Commissioner regarding complaints of improper handling of personal information and privacy breaches.

- **The Privacy and Access Policy Research Section:** This section develops and communicates standards and guidance consistent with Treasury Board policies related to privacy, including privacy impact assessments and responses to privacy audits. The section supports the Privacy Management Framework Steering Committee (described later in this report), and undertakes research in the areas of access to information and privacy.

HRSDC processed 407 formal requests under the *Access to Information Act* in 2008–2009. In the three preceding years, the Department completed an average of 470 requests per year.

### ***A few words about HRSDC, Service Canada and the Labour Program...***

HRSDC's mission is to build a stronger and more competitive Canada, to support Canadians in making choices that help them live productive and rewarding lives, and to improve Canadians' quality of life.

To do this, HRSDC:

- develops policies that makes Canada a society in which all can use their talents, skills and resources to participate in learning, work and community;
- creates programs and supports initiatives that help Canadians move through life's transitions—from families with children to seniors, from school to work, from one job to another, from unemployment to employment, from the workforce to retirement;
- creates better outcomes for Canadians through service excellence with Service Canada and other partners; and
- engages its employees, establishes a healthy work environment, nurtures a culture of teamwork, and builds its leadership capacity.

HRSDC is committed to excellence in what it does:

- *For People* – as HRSDC serves Canadians with a focus on accountability and results.
- *Through Partnerships* – as HRSDC works with Canadians to find innovative ways to develop and deliver the policies and programs they need.
- *Through Knowledge* – generating, contributing, and sharing knowledge effectively to support and inform decision-making.

Service Canada was created in 2005 to improve the delivery of government programs and services to Canadians, by making access to them faster, easier, and more convenient.

Service Canada offers citizens single-window access to a wide range of Government of Canada programs and services through more than 600 points of service located across the country, call centres, and the Internet.

The federal Labour Program works for individuals and organizations by promoting safe, healthy, cooperative and productive workplaces that benefit everyone. Canadians are entitled to be treated fairly on the job and, through legislation, programs and services, the Labour Program fosters good working conditions, constructive labour-management relations and workplaces that are free from discrimination.

The workplace is changing rapidly and the Labour Program is helping Canadians to adjust and thrive in the new global economy. It does this by conducting research about developing trends, such as work-life balance, and by providing the latest information on collective bargaining and agreements.

The Labour Program has a long and proud history of protecting the rights and well being of both workers and employers since 1900.

The program administers and enforces workplace legislation and regulations, such as the *Canada Labour Code*, which covers industrial relations, health and safety, and employment standards, and the *Employment Equity Act*, which promotes workplace equality by removing the barriers faced by women, Aboriginal peoples, people with disabilities and visible minorities while on the job. These laws cover federally regulated workers and employers. Almost 10% of Canadians are employed in federally regulated sectors of the economy, including, banking, telecommunications, broadcasting, air, interprovincial rail, road and pipeline transportation, shipping and related services, uranium mining, and Crown corporations.

The Labour Program works closely with provincial and territorial governments, unions, employers, and international partners to enhance working conditions and ensure healthy and fair workplaces for all Canadians. Ultimately, the work done by this program and the information it provides covers subjects of interest to all Canadian workers and employers.





# 1 Summary of the Administration of the *Access to Information Act*

The following statistics describe the administration of the *Access to Information Act* within HRSDC for the period April 1, 2008, to March 31, 2009.

## **(a) Requests under the *Access to Information Act***

HRSDC received 350 requests under the *Access to Information Act* during the period in question.

HRSDC also received 127 requests for consultation from other government departments and third parties.

## **(b) Sources of Requests**

Most requests originated from the general public (153), followed by requests from organizations (80), the business community (61), the media (42) and academia (14).

## **(c) Disposition of Requests Completed**

A total of 407 requests were finalized during the period in question. Of these requests, 291 resulted in full or partial disclosure of the information requested. Full disclosure took place in 109 cases, and 182 cases resulted in a partial release of the requested information. Only 13 cases resulted in the complete exemption or exclusion of the requested information. The remaining 103 requests fell into the categories of “transferred,” “unable to process,” “abandoned by the applicant,” or “treated informally.”

## **(d) Exemptions Invoked**

Of those cases where HRSDC was able to fully process the request, exemptions were invoked 574 times. The exemption provision that was invoked the most frequently was subsection 19(1), regarding personal information about individuals other than the requestor. Subsection 19(1) was invoked 163 times. Section 21, on advice and guidance, was invoked 147 times, while section 20, concerning third-party financial or technical information, was applied 98 times. Section 23, the exemption used to protect information that is subject to solicitor-client privilege, was invoked in 40 cases. Section 14, on federal-provincial affairs, was applied 34 times. Section 24, which refers to statutory prohibitions against disclosure, was invoked 23 times. Subsection 16(1), the exemption used to protect the integrity of lawful investigations, was invoked in 22 cases. Section 13, which is used to protect confidential information provided by other levels of government, was applied to 14 requests. Other exemptions were used in fewer than 10 cases each.

## **(e) Exclusions Cited**

A total of 82 exclusions were invoked during the period in question.

## **(f) Completion Time**

A total of 276 requests were processed within 60 calendar days. Of these, 168 were processed within 30 days.

**(g) Extensions**

Extensions were invoked 191 times, with 119 exceeding 30 days. Consultations with other departments and third parties accounted for 99 extensions.

**(h) Method of Access**

In 290 cases, copies of original documents were provided. In four of these cases, the requestors chose to view the records on HRSDC's premises and subsequently obtained a copy of some or all of the requested documents. One applicant chose to view the records, without obtaining a copy.

**(i) Costs**

A total of 15 full-time equivalents were used to administer the *Access to Information Act* within HRSDC. Salaries amounted to \$967,000 and administration costs were \$144,000.

**(j) Net Fees Collected**

Total fees of \$3,481.10 were collected.

**(k) Fees Waived**

Fees were waived 308 times during the period in question, representing a total of \$7,900.00.

**(l) Complaints to the Information Commissioner**

HRSDC was notified of 27 complaints during the reporting period, which represents under 8% of requests received. Fourteen of these complaints fell in the category of refusal to disclose, 12 pertained to the time required to respond to the request, and one was categorized as miscellaneous.

As a comparison, the Department received 20 complaints in 2007–2008.

In 2008–2009, HRSDC was notified of the outcome of 20 complaints. In six of these cases, the complaint was resolved. In five cases, the allegations were not substantiated. The remaining 9 complaints were discontinued by the Office of the Information Commissioner.

During the reporting period, the Information Commissioner ruled on a complaint in which HRSDC had invoked section 26 on information that was to be published in the near future. As anticipated, the requested information was posted on the Internet within the timeframes established in the Act. While the complaint was deemed not substantiated by the Office of the Information Commissioner, HRSDC was informed that the applicant should have been contacted once again, when the information became publicly available. The Department has committed to follow the Commissioner's recommendations in this regard, and to notify applicants once information that is protected under section 26 is published.

The remaining complaints are isolated incidents and did not lead to a change in policies and procedures.

## 2 Highlights of the Administration of the *Access to Information Act*

### (a) Training

A key focus in the Access to Information and Privacy Division at HRSDC is the delivery of training courses. During the period in question, the Access to Information and Privacy Division provided 81 training sessions to 1,031 employees across the Department.

These sessions were provided to employees and senior management at National Headquarters and in the regions, and also include the access to information and privacy component of the Department's "Orientation for New Employees" sessions.

In addition to the sessions that were offered by the Access to Information and Privacy Division, the regional officials responsible for access to information and privacy in some regions also provided information sessions to their colleagues. Thirty-six access to information awareness sessions were given to 371 employees.

### (b) Overview of New Institutional *Access to Information Act* – Related Policies and Procedures Implemented During the Reporting Period

As mentioned in the introduction, HRSDC's two teams responsible for administering the access to information and privacy functions were integrated into one division during the 2008–2009 fiscal year. While both units worked very closely together before the integration to ensure consistency in applying the legislation, a few internal processes were revisited in order to bring both teams together and to support harmonization of policies and procedures. For example, the internally established timeframes for processing requests was adjusted slightly to ensure that all parties had sufficient time to respond to requests. Also, the signing authority for certain functions has been elevated to the director and/or manager levels.

### (c) Delegation of Authorities for the Administration of the *Access to Information Act*

At HRSDC, the *Access to Information Act* is administered centrally, with all requests for information processed by National Headquarters. The requested information is forwarded to the Access to Information and Privacy Division for review, possible exemption and disclosure to the requestor.

The instrument of delegation on the following pages is currently in force at HRSDC.

## DEPARTMENT OF HUMAN RESOURCES AND SKILLS DEVELOPMENT

### DELEGATION ORDER

### ACCESS TO INFORMATION ACT

I, Diane Finley, Minister of Human Resources and Skills Development, pursuant to Section 73 of the *Access to Information Act*, hereby designate the officer or employee of the Department of Human Resources and Skills Development whose position or title is set out in the attached Schedule, or the officers or employees occupying, on an acting basis or otherwise, those positions, to exercise the powers, duties or functions of the head of the institution under the Act that are set in the Schedule in relation to that officer or employee.

This delegation order supersedes any previous order executed pursuant to section 73 of the Act.

Dated at Ottawa, Ontario,

this 28<sup>th</sup> day of February 2008.

Diane Finley

The Honourable Diane Finley  
Minister of Human Resources and Skills Development

<b>Access to Information Act – Delegation of Authority Department of Human Resources and Skills Development</b>									
Description	Section	Deputy Minister HRSD	Deputy Minister Labour	Deputy Head Service Canada	ADMs of PPCA and Labour	Corporate Secretary HRSD	Director ATIP	Manager ATIP Operations	ATIP Officers
Responsibility of government institutions	4(2.1)	X	X	X	X	X	X	X	
Notice where access requested	7(a)	X	X	X	X	X	X	X	X
Giving access to record	7(b)	X	X	X	X	X	X	X	
Transfer of request to another government inst.	8(1)	X	X	X	X	X	X	X	X
Extension of time limits	9	X	X	X	X	X	X	X	
Payment of additional fees	11(2)	X	X	X	X	X	X	X	X
Payment of fees for EDP record	11(3)	X	X	X	X	X	X	X	X
Deposit	11(4)	X	X	X	X	X	X	X	X
Notice of fee payment	11(5)	X	X	X	X	X	X	X	X
Waiver of refund of fees	11(6)	X	X	X	X	X	X	X	

Director ATIP: Director of the Access to Information and Privacy Division

Manager ATIP Operations: Operations Manager within the Access to Information and Privacy Division

ATIP Officers: Officers within the Access to Information and Privacy Division at the PM-04 and PM-05 levels

Description	Section	Deputy Minister HRSD	Deputy Minister Labour	Deputy Head Service Canada	ADMs of PPCA and Labour	Corporate Secretary HRSD	Director ATIP	Manager ATIP Operations	ATIP Officers
Language of access	12(2)(b)	X	X	X	X	X	X	X	X
Access to alternate format	12(3)(b)	X	X	X	X	X	X	X	X
Refuse access – Obtained in confidence	13	X	X	X	X	X	X	X	
Refuse access – Federal-provincial affairs	14	X	X	X	X	X	X	X	
Refuse access – International affairs and defence	15	X	X	X	X	X	X	X	
Refuse access – Law enforcement, investigations	16	X	X	X	X	X	X	X	
Refuse access – <i>Public Servants Disclosure Protection Act</i>	16.5	X	X	X	X	X	X	X	
Refuse access – Safety of individuals	17	X	X	X	X	X	X	X	
Refuse access – Economic Interests of Canada	18	X	X	X	X	X	X	X	
Refuse access – Economic interest of the Canada Post Corporation, Export Development Canada, the Public Sector Pension Investment Board and VIA Rail Canada Inc.	18.1	X	X	X	X	X	X	X	

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Description	Section	Deputy Minister HRSD	Deputy Minister Labour	Deputy Head Service Canada	ADMs of PPCA and Labour	Corporate Secretary HRSD	Director ATIP	Manager ATIP Operations	ATIP Officers
Refuse access – Personal information	19	X	X	X	X	X	X	X	
Refuse access – Third party information	20	X	X	X	X	X	X	X	
Refuse access – Operations of Government	21	X	X	X	X	X	X	X	
Refuse access – Testing procedures, tests, audits	22	X	X	X	X	X	X	X	
Refuse access – Audit working papers and draft audit reports	22.1	X	X	X	X	X	X	X	
Refuse access – Solicitor-client privilege	23	X	X	X	X	X	X	X	
Refuse access – Statutory prohibitions	24	X	X	X	X	X	X	X	
Severability	25	X	X	X	X	X	X	X	
Information to be published	26	X	X	X	X	X	X	X	
Third party notification	27(1)	X	X	X	X	X	X	X	
Third party notification – Extension of time limit	27(4)	X	X	X	X	X	X	X	

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Description	Section	Deputy Minister HRSD	Deputy Minister Labour	Deputy Head Service Canada	ADMs of PPCA and Labour	Corporate Secretary HRSD	Director ATIP	Manager ATIP Operations	ATIP Officers
Third party notification – Notice of decision	28(1)(b)	X	X	X	X	X	X	X	
Third party notification – Representations in writing	28(2)	X	X	X	X	X	X	X	
Third party notification – Disclosure of record	28(4)	X	X	X	X	X	X	X	
Where the Information Commissioner recommends disclosure	29(1)	X	X	X	X	X	X	X	
Advising Information Commissioner of third party involvement	33	X	X	X	X	X	X	X	
Right to make representations	35(2)(b)	X	X	X	X	X	X	X	
Access to be given to complainant	37(4)	X	X	X	X	X	X	X	
Notice to third party (application to Federal Court)	43(1)	X	X	X	X	X	X	X	X
Notice to applicant (application to Federal Court by third party)	44(2)	X	X	X	X	X	X	X	X

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Description	Section	Deputy Minister HRSD	Deputy Minister Labour	Deputy Head Service Canada	ADMs of PPCA and Labour	Corporate Secretary HRSD	Director ATIP	Manager ATIP Operations	ATIP Officers
Special rules for hearings	52(2)(b)	X	X	X	X	X	X	X	
<i>Ex parte</i> representations (Federal Court)	52(3)	X	X	X	X	X	X	X	
Facilities for inspection of manuals	71(1)	X	X	X	X	X	X	X	
Annual report to Parliament	72	X	X	X	X	X	X	X	
<b>REGULATIONS</b>									
Transfer of request	6(1)	X	X	X	X	X	X	X	X
Search and preparation of fees	7(2)	X	X	X	X	X	X	X	X
Production and programming fees	7(3)	X	X	X	X	X	X	X	X
Providing access to records	8	X	X	X	X	X	X	X	
Limitations in respect of format	8.1	X	X	X	X	X	X	X	

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# 3 Statistical Report on the *Access to Information Act*

Institution Human Resources and Skills Development Canada / Ressources humaines et Développement des compétences Canada				Reporting period / Période visée par le rapport 2008/04/01 to 2009/03/31	
Source	Media / Médias 42	Academia / Secteur universitaire 14	Business / Secteur commercial 61	Organization / Organisme 80	Public 153

<b>I</b> 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	350
Outstanding from previous period / En suspens depuis la période antérieure	124
<b>TOTAL</b>	<b>474</b>
Completed during reporting period / Traitées pendant la période visée par le rapport	407
Carried forward / Reportées	67

<b>II</b> Disposition of requests completed / Disposition à l'égard des demandes traitées					
1.	All disclosed / Communication totale	70	6.	Unable to process / Traitement impossible	35
2.	Disclosed in part / Communication partielle	114	7.	Abandoned by applicant / Abandon de la demande	16
3.	Nothing disclosed (excluded) / Aucune communication (exclusion)	0	8.	Treated informally / Traitement non officiel	0
4.	Nothing disclosed (exempt) / Aucune communication (exemption)	8	<b>TOTAL</b>		<b>251</b>
5.	Transferred / Transmission	8			

<b>III</b> Exemptions invoked / Exceptions invoquées							
S. Art. 13(1)(a)	1	S. Art. 16(1)(a)	4	S. Art. 18(b)	2	S. Art. 21(1)(a)	53
(b)	5	(b)	3	(c)	0	(b)	75
(c)	7	(c)	15	(d)	3	(c)	13
(d)	1	(d)	0	S. Art. 19(1)	163	(d)	6
S. Art. 14	34	S. Art. 16(2)	9	S. Art. 20(1)(a)	2	S. Art. 22	4
S. 15(1) International rel. / Art. Relations intern.	13	S. Art. 16(3)	0	(b)	46	S. Art. 23	40
Defence / Défense	0	S. Art. 17	1	(c)	40	S. Art. 24	23
Subversive activities / Activités subversives	0	S. Art. 18(a)	1	(d)	10	S. Art. 26	0

<b>IV</b> Exclusions cited / Exclusions citées			
S. Art. 68(a)	2	S. Art. 69(1)(c)	5
(b)	0	(d)	4
(c)	0	(e)	23
S. Art. 69(1)(a)	8	(f)	2
(b)	0	(g)	38

<b>V</b> Completion time / Délai de traitement	
30 days or under / 30 jours ou moins	168
31 to 60 days / De 31 à 60 jours	108
61 to 120 days / De 61 à 120 jours	63
121 days or over / 121 jours ou plus	68

<b>VI</b> Extensions / Prorogations des délais		
	30 days or under / 30 jours ou moins	31 days or over / 31 jours ou plus
Searching / Recherche	41	34
Consultation	29	70
Third party / Tiers	2	15
<b>TOTAL</b>	<b>72</b>	<b>119</b>

<b>VII</b> 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

<b>VIII</b> Method of access / Méthode de consultation	
Copies given / Copies de l'original	286
Examination / Examen de l'original	1
Copies and examination / Copies et examen	4

<b>IX</b> Fees / Frais			
Net fees collected / Frais net perçus			
Application fees / Frais de la demande	\$1,525.00	Preparation / Préparation	\$0.00
Reproduction	\$873.60	Computer processing / Traitement informatique	\$450.00
Searching / Recherche	\$632.50	<b>TOTAL</b>	<b>\$3,481.10</b>
Fees waived / Dispense de frais	No. of times / Nombre de fois	\$	
\$25.00 or under / 25 \$ ou moins	246	\$	<b>1,567.60</b>
Over \$25.00 / De plus de 25 \$	62	\$	<b>6,332.40</b>

<b>X</b> Costs / Coûts	
Financial (all reasons) / Financiers (raisons)	
Salary / Traitement	\$ 967,000
Administration (O and M) / Administration (fonctionnement et maintien)	\$ 144,000
<b>TOTAL</b>	<b>\$ 1,111,000</b>
Person-year utilization (all reasons) / Années-personnes utilisées (raison)	
Person-year (decimal format) / Années-personnes (nombre décimal)	15

<b>Supplemental Reporting Requirements</b> <i>Access to Information Act</i>	<b>Exigences en matière de rapports supplémentaires</b> <i>Loi sur l'accès à l'information</i>
<p>In addition to the reporting requirements addressed in form TBS/SCT 350-62 "Report on the Access to Information Act," institutions are required to report on the following using this form:</p>	<p>En plus des exigences relatives à l'établissement de rapports dont on traite au formulaire TBS/SCT 350-62, « Rapport concernant la Loi sur l'accès à l'information », les institutions sont tenues de déclarer ce qui suit, en utilisant le présent formulaire :</p>
<p><b>Part III – Exemptions invoked</b></p>	<p><b>Partie III – Exceptions invoquées</b></p>
<p>Section 13 Subsection 13(e) _____ <b>0</b> _____</p>	<p>Article 13 Paragraphe 13(e) _____ <b>0</b> _____</p>
<p>Section 14 Section 14* _____ <b>18</b> _____ Subsections 14(a) _____ <b>12</b> _____ 14(b) _____ <b>4</b> _____</p>	<p>Article 14 Article 14* _____ <b>18</b> _____ Paragaphes 14(a) _____ <b>12</b> _____ 14(b) _____ <b>4</b> _____</p>
<p>* If the information qualifies for section 14 but does not fall within the scope of one of the examples cited in subsections 14(a) or 14(b), the information is exempted pursuant to section 14. HRSDC invoked this exemption 18 times in 2008-2009, and applied section 14, and its two subsections a total of 34 times during the course of the fiscal year.</p>	<p>* Si l'article 14 s'applique à un renseignement, mais que cette information ne correspond pas à l'un des exemples cités aux paragraphes 14(a) ou 14(b), le renseignement est protégé en vertu de l'article 14. RHDC a invoqué cet article 18 fois en 2008-2009, et au total a appliqué l'article 14 et ses deux paragraphes à 34 reprises au courant de l'exercice financier.</p>
<p><b>Part IV – Exclusions cited:</b></p>	<p><b>Partie IV – Exclusions citées</b></p>
<p>Subsection 69.1 (1) _____ <b>0</b> _____</p>	<p>Paragraphe 69.1 (1) _____ <b>0</b> _____</p>