



Unclassified

Internal Audit Services Branch

Audit of the Access to Information Process

July 2016

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Table of Contents

Executive Summary	1
1.0 Background	3
1.1 Context	3
1.2 Audit Objective	3
1.3 Scope.....	4
1.4 Methodology	4
2.0 Audit Findings	5
2.1 A governance framework is in place to support the ATIP function, although oversight requires strengthening.....	5
2.2 The Department is having difficulty complying with the statutory time limits as set out in the <i>Access to Information Act</i>	6
2.3 The Department is tracking and monitoring its performance, however, data integrity needs to be improved	8
2.4 The BPR has made improvements to the ATI process, although the intended objective to improve ATI service levels has not yet been achieved	9
3.0 Conclusion	13
4.0 Statement of Assurance	13
Appendix A: Audit Criteria Assessment.....	14
Appendix B: Glossary.....	15

Executive Summary

The *Access to Information Act* gives every Canadian citizen, permanent resident and individual or corporation present in Canada the right to access records—in any format—that are under the control of a government institution, subject to certain specific and limited exceptions. The Act requires the head of a government institution to respond to a request within 30 calendar days after the request is received or longer with an extension for a reasonable period of time due to specific circumstances (i.e. large number of records or required consultation).

Employment and Social Development Canada's (ESDC) Access to Information and Privacy Operations Division is the lead in administering access to information and privacy legislation. Assistant Deputy Ministers (ADM) across ESDC are responsible for the timely search and retrieval of relevant records within their respective Branches and Regions and for the formulation of recommendations regarding their disclosure. Responding to an ATI request is a departmental priority that requires all stakeholders to carry out their roles and responsibilities in order for the Department to meet its objectives in providing timely access to records under the Act. Over the past few years, increasing volumes of requests with a greater level of complexity combined with human resource capacity issues have impacted the Department's performance in responding to Access to Information (ATI) requests. A Business Process Redesign (BPR) of the ATI process was launched May 2015 to address challenges identified with the current process. The objective was to simplify and improve the ATI process, ensuring that quality responses are provided in a timely manner. The target was to sustain service levels of 95% with response delays of between zero and five percent.

Audit Objective

The objective of this audit was to provide assurance that the ATI process complies with the *Access to Information Act*, is effective and is operating as intended.

Summary of Key Findings

- A governance framework is in place to support the Access to Information and Privacy (ATIP) function, although oversight requires strengthening.
- The Department is having difficulty complying with the statutory time limits as set out in the *Access to Information Act*.
- The Department is tracking and monitoring its performance, however, data integrity needs to be improved.
- The BPR has made improvements to the ATI process, although the intended objective to improve ATI service levels has not yet been achieved.

Audit Conclusion

The audit concluded that the ATI process complies with the *Access to Information Act* although it is not operating as intended. There are opportunities to improve oversight, timeliness of responses, resourcing issues, data integrity and to move forward with initiatives to modernize the ATI function.

Recommendations

1. It is recommended that the Corporate Secretary, on a periodic basis, table for discussion at Department wide committees ATI performance results, seek appropriate senior management guidance, and follow-up on recommended actions.
2. It is recommended that the Corporate Secretary implement a strategy to address ATI response delays and ATI analyst skill shortages.
3. It is recommended that the Corporate Secretary ensure complete and accurate performance reporting.
4. It is recommended that the Corporate Secretary continue to improve the ATI function to support service delivery by addressing training gaps and modernization efforts.

I.0 Background

I.1 Context

The *Access to Information Act*, which came into effect on July 1, 1983, gives every Canadian citizen, permanent resident and individual or corporation present in Canada the right to timely access of records—in any format—that are under the control of a government institution, subject to certain specific and limited exceptions. The Act requires the head of a government institution to respond to a request within 30 days after the request is received or longer with an extension for a reasonable period of time due to specific circumstances (i.e. large number of records or required consultation). The requester has the right to make a complaint to the Information Commissioner about time extensions or if the record was not provided within the time limits set out in the Act (deemed refusal to give access).¹

ESDC's Access to Information and Privacy Operations Division is the lead in administering access to information and privacy legislation. The Director of the Division reports to the Corporate Secretary in her capacity as the Chief Privacy Officer for the Department. The Division is the main point of contact with the Office of the Privacy Commissioner of Canada and the Office of the Information Commissioner (OIC) for complaint resolution. The Division is made of two units: the Request Processing Unit and the Incident Management and Legislative Disclosures Unit. The Request Processing Unit is the focus of this audit and will be referred to as ATIP Operations (ATIP Ops) for the context of this report. ATIP Ops is a centralized group, with approximately 19 full-time equivalent positions (including vacancies)² who are involved in the processing of requests. ATIP Ops is involved in processing ATI and Privacy requests, responding to complaints (Privacy and ATI), consultations with other government departments (OGD), providing advice and guidance to departmental staff on the application of the ATI and Privacy legislation as well as performance reporting (internally, to Treasury Board (TB) and Parliament).

ADM across ESDC are responsible for the timely search and retrieval of relevant records within their respective Branches and Regions and for the formulation of recommendations regarding their disclosure. Responding to an ATI request is a departmental priority that requires all stakeholders to carry out their roles and responsibilities in order for the Department to meet its objectives in providing timely access to records under the Act.

In May of 2015 the Corporate Secretary launched the BPR to address challenges identified with the current ATI process such as: increased volumes of requests, more complex requests and an increase in the number of complaints.

I.2 Audit Objective

The objective of this audit was to provide assurance that the ATI process complies with the *Access to Information Act*, is effective and is operating as intended.

¹ [Access to Information Act \(R.S.C., 1985, c. A-1\)](#)

² As per the November 2015 Request Processing Unit organization chart.

I.3 Scope

The scope of this audit included ATI activities carried out from January 2015 to March 2016.

The audit scope did not include the following:

- An assessment of the accuracy or completeness of completed ATIP requests;
- The management of Privacy requests or the Incident Management and Legislative Disclosures Unit;
- Privacy management areas addressed in the Audit of the Departmental Control Framework for the Management of Personal Information (Privacy) which took place in 2014.

I.4 Methodology

The audit was conducted using the following methodologies which included but were not limited to:

- Review of applicable TB and departmental policies, directives and guidelines;
- Review of documentation supporting the redesign of the ATI process;
- Review of monitoring activities and performance reporting;
- Interviews with present and past directors of ATIP Operations Division and key ATIP Ops personnel. Representatives from 12 Branches and all four Regions also provided feedback on the ATI process;
- Consultation with Strategic Communications and the facilitator from the BPR working group;
- On-site observations and a process walkthrough; and
- Sampling and testing of ATI requests between April 2015 and December 2015 from the monthly reports and backlog list.

2.0 Audit Findings

2.1 A governance framework is in place to support the ATIP function, although oversight requires strengthening

The Director of the ATIP Operations Division reports to the Corporate Secretary in her capacity as the delegated authority for the administration of the *Access to Information and Privacy Acts*. A Delegation Order³ was approved in June 2015 by the former Ministers of ESDC and Labour. This formally authorizes employees from the Deputy Ministers through to the ATI officers at the PM-04 and PM-05 levels to exercise specific duties or functions under the *Access to Information Act*. As a result it enables those individuals closely associated with the day-to-day operations to make decisions for efficient processing of ATI responses.

There is a governance framework in place to support the ATIP function. This consists of the Portfolio Management Board (PMB) and Corporate Management Committee (CMC). The audit noted that the mandate, decision making authority, membership and frequency of meetings were clearly established through a formal Terms of Reference. PMB acts as the main decision making body responsible for setting strategic directions and priorities as well as providing guidance on issues that affect the Department. CMC supports PMB by overseeing departmental activities.

The Department's ATI performance is reported to PMB through quarterly reports in the form of an annex item for information. The ATI Quarterly Management Reports highlight the details of ATI performance at the Branch and Regional level including departmental compliance, however, this report is not discussed unless one of the members has a question or raises an issue. The audit team noted that ATI performance issues such as ATI capacity and skill shortages, increasing volume and complexity of requests and the delays in implementing the paperless system as part of the BPR are not clearly outlined in the quarterly reports provided to PMB. Our review of corresponding records of decisions (January 2015 to March 2016) indicated that an ATI related performance discussion occurred only once (May 2015) without a requirement for follow-up. Oversight at the senior management level is an important element of a management framework. It was one of the areas identified by the Department in 2010 and the OIC in 2015 as an enabler of outstanding performance.

Recommendation

It is recommended that the Corporate Secretary, on a periodic basis, table for discussion at Department wide committees ATI performance results, seek appropriate senior management guidance, and follow-up on recommended actions.

Management Response

The Corporate Secretary concurs with this recommendation. In the future, the Corporate Secretary will periodically engage PMB and CMC in discussions on access to information and bring forward key challenges and provide recommendations on the way forward for senior management consideration. Actions are expected to be completed by the third quarter of 2016–2017.

³ Under section 73 of the *Access to Information Act*, “the head of a government institution may, by order, designate one or more officers or employees of that institution to exercise or perform any of the powers, duties or functions of the head of the institution under this Act that are specified in the order”.

2.2 The Department is having difficulty complying with the statutory time limits as set out in the *Access to Information Act*

As per the *Access to Information Act* a government institution must respond to a request within 30 calendar days after the request is received, each request must be handled on a priority basis and any delays in responding place the Department in potential violation of the Act. A complaint may be filed and investigated by the OIC. The Information Commissioner⁴ would make a finding and facilitate a resolution or make a recommendation for corrective action.

The Department was assessed by the OIC in 2010–2011 at a rating of “A” which indicates outstanding performance with a deemed refusal⁵ rate of 3.5%⁶. The Department in 2010–2011 received 492 requests and processed 106,518 pages. As per the OIC report on Measuring up⁷, the Department attributed its performance to having a strong and knowledgeable access to information team, with little turnover, and the implementation of quarterly reporting to clearly communicate and brief senior management on the Department’s ATI statistics. However, the Department’s compliance rate with the Act has declined over the past few years. The Department has self-assessed itself in accordance with the OIC standards⁸ at a rating of between “D” and “F” which indicates below average and unsatisfactory performance⁹ and this trend has continued into 2015–2016 as depicted by the table below.

Departmental Compliance*

	2014–2015				2015–2016			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Number of requests received	456	511	299	318	327	319	365	545
Proportion of requests processed on time	85%	83.1%	76.1%	66%	82.3%	82.9%	72.1%	73.4%
Deemed rate of refusal	15%	16.9%	23.9%	34%	17.7%	17.1%	27.9%	26.6%
Grade (according to OIC Standard)	D	D	F	F	D	D	F	F

* Extracted from ESDC’s Quarterly Access to Information Management Reports with the exception of Q4 2015–2016, these numbers were provided by ATIP Ops April 28, 2016. The audit testing revealed data integrity issues which are discussed in Section 2.3. As data analysis for 2015–2016 is not completed, the final numbers may vary slightly from the table above.

The audit team was informed that significant increases in volume and complexity of requests have contributed to the increase in the non-compliance rates for 2014–2015 (1,160 requests received and 139,549 pages processed) and 2015–2016 (1,571 requests and 257,325 pages processed). An

⁴ Extracted April 7th, 2015 from the OIC website, from the What We Do page.

⁵ As per TB, deemed refusal is defined as: “access to a record or a part thereof not provided within the time limits”.

⁶ Which means that approximately only 4 out of 100 requests received by ATI Ops were not responded to or received a delayed response (outside of the time allowed including extensions).

⁷ Measuring Up, a special report to Parliament on improvements and ongoing concerns in access to information, 2008–2009 to 2010–2011 by the Office of the Information Commissioner of Canada in May 2012.

⁸ OIC suspended the individual report card process for all 18 institutions in 2012 stating that they would be monitoring annual reports to Parliament along with complaint data to determine which institutions would be the subject of future report cards.

⁹ Self-assessment from the quarterly reports based on the rating standards outlined by the Office of the Information Commissioner. A=0 to 5%, B=5 to 10%, C=10 to 15%, D=15 to 20%, F= more than 20%.

additional factor has been the recent Federal Court¹⁰ ruling stating that the government can no longer charge fees for the search and processing of electronic government documents under the Act. This means that all electronic records can now be requested without restriction on the size, year or resources required to gather the information. Resourcing issues (e.g. departure of experienced ATI analysts) were also noted as another contributing factor to unsatisfactory results reporting in the third and fourth quarters of both years.

This past year has seen many changes in leadership with the introduction of a new Corporate Secretary and Director of ATIP Operations Division as well as the continued resource issues. The audit team was informed that the ATIP Ops has lost experienced team leaders and analysts through retirement or for similar positions with OGD. An ATIP organizational review completed in 2010 identified a future skills deficiency risk as most of the ATIP analysts, at that time, were a few years away from retirement. It was recommended that a succession plan and a developmental program be put in place to ensure the transfer of knowledge and skills to junior staff. However, this did not take place resulting in a shortage of skilled analysts to meet the statutory timelines.

As per an OIC arm chair discussion in 2012, “institutions must devote adequate resources to fulfilling their duties under the *Access to Information Act*”.¹¹ The audit team reviewed several responses from the OIC on requester complaints which stated that resource and workload issues were not valid reasons for delaying an ATI response. The backlog files reviewed revealed delays of 86 to 700 days with periods of inactivity between actions on these files. ATIP Ops attributed workload issues and the time waiting for a consultation with other stakeholders (internal or external) as the reasons for periods of inactivity. Audit testing also revealed that many requests which included extensions for volume fell below the minimum number of pages as per TB¹² and OIC guidance.¹³ For example, one request noted 206 pages received and 104 reviewed with an extension for volume of 45 days. There is no system or strategy to actively manage the inventory of late requests, the emphasis is primarily on requests that can be processed within the timelines. The audit team noted that a resource was assigned to clear the backlog; however, before it could be cleared another replaced it. We feel a strategy is needed to not only address the processing of new ATI requests but also to address the inventory of late requests.

Contractors are temporarily being sought to address gaps until experienced ATI resources can be hired or developed. However, there is also a skill shortage in this field throughout government. ESDC's experienced ATI analysts, as per the weekly reports, are managing an average workload of 40-50 files while coaching junior team members as well as carrying out other duties related to ATIP (i.e. Privacy requests processing, OGD consultations, complaints, ad hoc reporting and special requests). The audit team noted an unequal distribution of work as some analysts are new and on average it takes approximately two years to develop basic ATI competencies. This places significant pressure on experienced team members and contributes to the challenges that the Department is currently managing.

All of the above factors are contributing to the Department's ability to maintain a level of performance to adequately comply with its statutory obligations.

¹⁰ As per Information Commissioner of Canada v. Attorney General of Canada, 2015 FC 4050, March 31, 2015.

¹¹ OIC, September 24, 2012, Modernizing the Access to Information Act: An Opportune Time, Armchair discussion.

¹² As per TB, more than 500 pages relevant to a request are considered a large number of records.

¹³ Time extensions pursuant to paragraph 9(1)(a) of the Access to Information Act provides that institutions may extend the 30 day time limit to respond to a request for a large number of records. The OIC has been considering 1,000 pages of records as a benchmark for what constitutes a large number. However this number is based on archival standards developed prior to the deployment of electronic record systems throughout government.

Recommendation

It is recommended that the Corporate Secretary implement a strategy to address ATI response delays and ATI analyst skill shortages.

Management Response

The Corporate Secretary concurs with this recommendation. A government wide shortage of experienced ATI analysts has been a long standing challenge, and has been recognized by TB Secretariat as a systemic issue.

ESDC is committed to work with TB Secretariat and the ATIP community across government in finding a long term solution for recruitment, training, and retention of skilled analysts well equipped to support the shift to more open government. Actions will be ongoing until completed.

2.3 The Department is tracking and monitoring its performance, however, data integrity needs to be improved

ATIP Ops uses a system called AccessPro Case Management (APCM) to process ATIP requests. APCM is an automated central processing system that allows analysts to track their actions, create correspondence, and capture essential data related to the processing of an ATIP request, such as the requesters' relevant information, scope of the request and other relevant tombstone data. APCM allows the production of statistical information for the preparation of reports such as departmental performance report and the ATI Annual Report to Parliament which Deputy Heads of every federal government institution must submit following the close of each fiscal year.

ATI request tracking and reporting is a tool within the Department to monitor performance and to identify issues that may need to be highlighted in order to better manage them or to escalate them to senior management. The audit found that the data generated by APCM did not support the information reported in the ATI Quarterly Management Reports. The audit team's comparison of the number of requests received in the monthly report (generated for the audit) and the number of requests reported in the quarterly reports (first, second and third quarters) for 2015–2016 had large variances. A review of quarterly reports also revealed differences. For example, an earlier version of the quarterly report from 2014–2015 indicated a deemed refusal rate of 28.6% for Q2 but in a later version that number became 16.9% without an explanation. In addition, the 2014–2015 Annual Report on the Administration of the *Access to Information Act* reported 29 complaints while the OIC reported 33. The auditors also noted during testing a number of Privacy requests that were processed as ATI requests. The manager explained that this occurs when a requester mistakenly makes an ATI request when in fact it is a request for personal information. Privacy requests treated as ATI requests are captured as ATI requests for reporting purposes and as such may inflate the number of ATI requests reported.

These findings were raised at the conclusion of the conduct phase of the audit and the auditors were advised that ATIP Ops is aware of these issues and is currently exploring ways to ensure more accurate reporting.

Recommendation

It is recommended that the Corporate Secretary ensure complete and accurate performance reporting.

Management Response

The Corporate Secretary concurs with this recommendation. To have more complete and accurate performance reporting, ESDC will focus its attention and align available resources to data validation and business intelligence analysis as well as maximizing the use of available technology.

In the upcoming year(s), the Corporate Secretary plans to work with other areas of the organization to strengthen its reporting and analysis capability in order not only to increase performance monitoring accuracy but also to provide evidence-based analysis that will help identify opportunities to advance the Open Government Action Plan. Actions are expected to be completed by the first quarter of 2017–2018.

2.4 The BPR has made improvements to the ATI process, although the intended objective to improve ATI service levels has not yet been achieved

The Corporate Secretary launched a BPR project to address the challenges with increasing volumes and resources not keeping pace. The objective of the BPR was “to simplify and improve the ATI process, ensuring that quality responses are provided in a timely manner.” As per the project charter, the target was to sustain service levels of ATIP processing within the legislated delays for 95% of requests (meaning a deemed refusal between 0-5%). The BPR was implemented in May 2015 and although some of the improvements have streamlined the ATI process, the intended objectives were not all achieved.

Some of the improvements that the audit team observed were:

- Replaced the seen and noted signatures with the Advance Release Notification (ARN), this means that the ADM who is accountable for the information is only required to review and approve the ATI package once eliminating duplication of effort. The ARN which includes the redacted¹⁴ or fully disclosed ATI release packages (where applicable) is posted on the ATIP SharePoint site for key stakeholders four days prior to release to the requester.
- Increased guidance and awareness by introducing the SharePoint Web Site and ATI awareness sessions. All the information necessary to complete an ATI request is available in the References and Tools Section of the web site including how to support exemption or exclusion recommendations.¹⁵
- Partnered with the TB Access to Information and Privacy Online Request system. ESDC is now receiving a number of ATI requests from the on-line application which includes paid fees.

¹⁴ Redaction imaging software is an add-on solution that is used with APCM. It is designed for document handling to copy and sever information that is exempted or excluded.

¹⁵ A recommendation is meant not only to identify the potential exemption or exclusion, it is meant to explain the rationale supporting the exemption/exclusion.

However, some elements did not have the intended outcome or were not implemented. Simplifying and streamlining the ATI process was intended to generate time flexibility for ATIP Ops, Branch and Regional stakeholders to better manage ATI obligations under the Act. However, this did not address the ongoing challenges with volume of requests or the ATI skill shortages (see section 2.2).

Common Drop Zone Initiative

The launch of the Common Drop Zone Initiative was postponed just as it was about to be launched in May 2015. The Common Drop Zone was to provide Branches and Regions with an area, within SharePoint, where they could submit ATI response content electronically and in a centralized area. As of the completion of this audit this initiative has not been implemented. ATI cited too many unknowns such as stakeholder support, storage capacity, software licencing and workload, still need to be resolved prior to a full launch. The Common Drop Zone Initiative would eliminate the need to print electronic documents which are then scanned by ATIP Ops for redaction. This process is not only inefficient but also metadata that would have been part of the original electronic version is lost. As per the TB Standard on Metadata¹⁶, metadata is part of a document and is subject to the *Access to Information Act*.

Roles and responsibilities

The three main groups who play an important role in the departmental ATI process are: the ATI analysts (ATIP Ops); the Branch or Region Liaison Officers (LO); and the subject matter experts (SME) in the program area. The LO manage the process within their respective Branches or Regions and the SME are responsible for assessing the request and retrieving relevant documents. Responding to an ATI request is a departmental activity that requires all three stakeholders to clearly understand their roles and responsibilities. Failure of any one group to carry out this component with due diligence hinders the entire process and could delay the Department in meeting its objective of providing a timely response to the requester.

The roles and responsibilities of ATI stakeholders have been established and communicated although they do not appear to be clearly understood. During interviews, ATI stakeholders revealed a common misconception that ATI analysts from ATIP Ops are generally regarded as the SME, when in fact their expertise is based on their knowledge of the legislation. ATI analysts do not have sufficient program experience to identify potential program sensitivities. SME within the Branch or Region have the in-depth knowledge of their programs and are expected to be aware of any harm or injury¹⁷ that may be caused if sensitive information is released. SME are required to scope the request, identify sensitive information and justify their recommendations for exemptions and exclusions during the document retrieval process.

The final decision to exempt or exclude, based on the legislation, is at the discretion of the Delegated Authority, i.e. Director of ATIP Operations Division or Manager of ATIP Ops. Without the contextual information within the recommendation the Director or Manager may not be able to defend the decision to exempt or exclude information to OIC in the event of a complaint or litigation. Audit testing showed that only a few responses sampled included the recommendation sheet while others used the response sign-off sheet to identify sensitive information but did not provide sufficient explanation.

¹⁶ Metadata is usually defined as “data about data” or “information about information”. It is a hidden level of extra information that is automatically created and embedded in a computer file. This data may be administrative or descriptive or may relate to a record’s preservation or use.

¹⁷ Harm or injury is demonstrated, for example, by releasing information on the vulnerability of buildings or systems that could assist individuals in committing a crime or releasing information about an individual that could threaten their safety.

The approval of the release package to the requester requires a two stage sign-off, first by the accountable ADM of the Branch or Region followed by a review of the package to be released by the team leader, manager and approval by the Director of ATIP Operations Division. Finally an ARN to all stakeholders including Strategic Communications is issued. Strategic Communications is a valuable partner responsible for preparing potential media lines that may be required as part of the release, however, early consultation is key. The audit team observed that mitigating controls were in place to reduce the risk that exempted or excluded information could be disclosed. The onus lies with the Branch SME and the accountable ADM to identify information to be exempted or excluded within the recommendation sheet, however, if this is not properly completed, the risk of inappropriate disclosure remains.

Focused training for Liaison Officers and Subject Matter Experts

Each Branch or Region is equipped with an ATIP Liaison Officer who works directly with ATIP Ops. There are approximately 25 LO across the Department. The audit found that the majority of LO who provided feedback (17 of the 25) on the ATI process had been in their roles for less than two years. Focused training for the LO was identified in the BPR as a key element to ensure that the LO have the knowledge and tools to carry out their ATI responsibilities. The audit team was informed that ATIP Ops holds meetings and regular monthly phone calls with the LO to share best practices, discuss emerging issues and provide guidance. ATIP Ops also held 26 separate in-person training sessions (between April and November 2015) to reinforce ATI roles and responsibilities of departmental employees. The training sessions provide a general overview of the ATI process that is not sufficiently detailed to prepare the LO for their role. Furthermore, the findings and the feedback provided by the LO during the audit indicated that there are still training gaps and opportunities for more focused training to improve the processing of ATI requests.

Once a request for records has been made, LO are responsible for coordinating the document retrieval process by first identifying the program SME in their area and then playing a liaison role between ATIP Ops and the SME. Following which the LO would review and submit the response package for approval within their Branch or Region prior to sending it to ATI Ops for processing. As per a review of ATIP's weekly status reports several ATI analysts are managing a workload of 40–50 time sensitive request files which can contain several hundreds to thousands of pages each. As per the manager, on average, an ATI analyst has the ability to process approximately 50 to 100 pages per day. As such, ATIP Ops is highly dependent on the LO and the SME who play critical roles in the document retrieval process in terms of providing relevant scoped¹⁸ documentation that is supported by recommendations within the timelines. Without in-depth training the LO and the SME may not be clear on their roles to support the Branch or Region in fulfilling their ATI obligations. Audit testing highlighted situations where ATI Ops received hundreds to 1,000s of pages from Branches and Regions while only one half to a fraction of this number was deemed to be relevant to the response.

Recommendation

It is recommended that the Corporate Secretary continue to improve the ATI function to support service delivery by addressing training gaps and modernization efforts.

¹⁸ Scoping is the act of gathering and determining, based on the parameters (set by the requester), specific information pertaining to the request.

Management Response

The Corporate Secretary concurs with this recommendation. There is currently no ATIP professional development strategy in place for ATIP analysts or liaison officers. Plans are underway to work with the ATIP community, TBS and the Canada School of Public Service to advance training and development of the ATIP community across government. Actions will be ongoing until completed.

3.0 Conclusion

The audit concluded that ATI process complies with the *Access to Information Act* although it is not operating as intended. There are opportunities to improve oversight, timeliness of responses, resourcing issues, data integrity and to move forward with initiatives to modernize the ATI function.

4.0 Statement of Assurance

In our professional judgement, sufficient and appropriate audit procedures were performed and evidence gathered to support the accuracy of the conclusions reached and contained in this report. The conclusions were based on observations and analyses at the time of our audit. The conclusions are applicable only for the Audit of the Access to Information Process. The evidence was gathered in accordance with the *Internal Auditing Standards for the Government of Canada* and the *International Standards for the Professional Practice of Internal Auditing*.

Appendix A: Audit Criteria Assessment

Audit Criteria It is expected that:	Rating
The redesigned process is effective and efficient in the management of ATI requests.	●
The risk of disclosure of excluded or exempted information is mitigated.	●
Clear procedures on the ATI process are established and made available to all employees.	●
The Department complies with the requirements and timeframes set forth in the Act for processing ATI requests.	●
A governance framework is in place to oversee the implementation and management of ATI within the Department.	●
Branch and regional resources involved in managing ATI requests have the knowledge, tools and training to carry out their responsibilities.	●
Accurate and timely reporting supports monitoring, oversight activities and provides relevant information for decision making.	●
Performance measures are in place to monitor and report on departmental performance.	●

- ✱ = Best practice
- = Sufficiently controlled, low risk exposure
- = Controlled, but should be strengthened, medium risk exposure
- = Missing key controls, high risk exposure

Appendix B: Glossary

ADM	Assistant Deputy Ministers
APCM	AccessPro Case Management
ARN	Advance Release Notification
ATI	Access to Information
ATIP	Access to Information and Privacy
ATIP Ops	ATIP Operations
BPR	Business Process Redesign
CMC	Corporate Management Committee
ESDC	Employment and Social Development Canada
LO	Liaison Officers
OGD	Other Government Departments
OIC	Office of the Information Commissioner
PMB	Portfolio Management Board
SME	Subject Matter Experts
The Act	<i>the Access to Information Act</i>
TB	Treasury Board