



Financial Transactions and  
Reports Analysis Centre  
of Canada

Centre d'analyse des opérations  
et déclarations financières  
du Canada

## 2015 Open Government Implementation Plan (OGIP) Financial Transactions and Reports Analysis Centre of Canada

October 2015

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## **1. *Executive Summary***

Canada has a longstanding commitment to openness and accountability as a cornerstone of a strong, modern democracy. From the passing of access to information legislation over 30 years ago to current open government and proactive disclosure activities, the Government of Canada has worked to ensure transparency on federal operations to enable Canadians to hold their government accountable. The commitments included in [Canada's Action Plan on Open Government 2014-16](#) will further the progress on the delivery of transparent and accountable programs and services focused on the needs of Canadians.

The proactive release of data and information is the starting point for all other open government activity. Accordingly, the Government of Canada has firmly established an "open by default" position in its mandatory policy framework by issuing the [Directive on Open Government](#).

Under the direction of FINTRAC's Information Management Senior Official (IMSO) and Chief Information Officer (CIO), FINTRAC has identified several priorities and drivers for change related to Open Government. As the Centre works to achieve compliance with the Open Government Directive, FINTRAC's Open Government Implementation Plan will be posted online and updated annually. This plan will include changes to existing and/or new initiatives related to becoming compliant with the Directive over the next five years.

As Canada's financial intelligence unit (FIU), FINTRAC facilitates the detection, prevention and deterrence of money laundering, and terrorist activity financing by engaging in the following activities: receiving financial transaction reports and voluntary information reports; safeguarding personal information under its control; ensuring compliance of reporting entities; maintaining a registry of money services businesses in Canada; producing financial intelligence relevant to investigations of money laundering, terrorist activity financing and threats to the security of Canada; researching and analyzing data from a variety of information sources that shed light on trends and patterns in money laundering and terrorist activity financing; and enhancing public awareness and understanding of money laundering and terrorist activity financing.

As described in the Treasury Board of Canada Secretariat's (TBS) Directive on Open Government, all data and information resources of business value held by Government of Canada departments are to be open by default and released as open data and/or open information unless subject to valid exceptions. This presents several challenges to the Centre as it moves towards compliance with the Directive. The Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA) establishes stringent rules that govern both the management and disclosure of all information contained in the Centre's transaction reports and other records. Secondly, a cultural change is needed in any organization to support the move to "open by default". Finally, FINTRAC needs to reallocate existing human resources, and may need to reprioritize initiatives to implement the internal changes required to become compliant with the Directive on Open Government.

Through achieving compliance with the Directive on Open Government, FINTRAC has the opportunity to transform its information culture to be in a better position to leverage the information resources we receive and produce. Adopting and integrating open data and information formats will better position the Centre to leverage external resources, such as the Federal Geospatial Platform. Finally, achieving compliance will allow FINTRAC to promote transparency while enhancing public awareness of Money Laundering and Terrorist Financing by continuing to share data and information on the Open Government Portal, while respecting information protection and privacy requirements of the PCMLTFA.

As FINTRAC works towards implementing Open Government, the Centre will integrate its Open Government obligations into activities related to procuring, developing, or modernizing departmental information applications, systems, or solutions. FINTRAC's Information Management (IM) training and awareness program for all staff will be augmented with information related to Open Government.

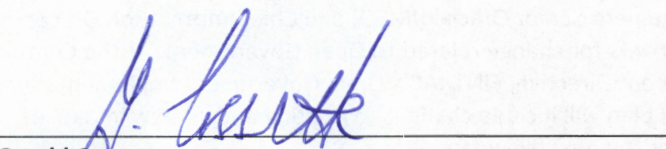
## 2. Approvals



**Stephane Cousineau**

Information Management Senior Official, Deputy Directory and Chief Information Officer  
Information Management / Information Technology Sector  
Financial Transactions and Reports Analysis Centre of Canada

2015-10-28  
Date



**Gerald Cossette**

Director  
Financial Transactions and Reports Analysis Centre of Canada

3/11/2015  
Date

### **3. Purpose**

This document describes FINTRAC's plan to complete activities and deliverables aligned to the requirements of the Directive on Open Government, in order to achieve full compliance by the March 31<sup>st</sup>, 2020 implementation deadline.

The objective of the Directive is to maximize the release of government information and data of business value to support transparency, accountability, citizen engagement, and socio-economic benefits through reuse, subject to applicable restrictions associated with privacy, confidentiality, and security. (Directive on Open Government, Section 5.1)

The expected results of the *Directive on Open Government* (Section 5.2) are that Canadians are able to find and use Government of Canada information and data:

- to support accountability;
- to facilitate value-added analysis;
- to drive socio-economic benefits through reuse; and,
- to support meaningful engagement with their government.

### **4. Context**

#### **4.1 FINTRAC's Mandate, Vision and Mission**

The Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) is Canada's financial intelligence unit (FIU). We strive to be recognized as a world-class financial intelligence unit in the global fight against money laundering and terrorist activity financing. FINTRAC facilitates the detection, prevention and deterrence of money laundering, and terrorist activity financing by engaging in the following activities:

- Receiving financial transaction reports and voluntary information on money laundering and terrorist activity financing in accordance with the legislation and regulations;
- Safeguarding personal information under its control;
- Ensuring compliance of reporting entities with the legislation and regulations;
- Maintaining a registry of money services businesses in Canada;
- Producing financial intelligence relevant to investigations of money laundering, terrorist activity financing and threats to the security of Canada;
- Researching and analyzing data from a variety of information sources that shed light on trends and patterns in money laundering and terrorist activity financing; and
- Enhancing public awareness and understanding of money laundering and terrorist activity financing.

FINTRAC is an independent agency that operates at arm's length from the law enforcement agencies and other entities to which it is authorized to disclose financial intelligence. It reports to the Minister of Finance, who is in turn accountable to Parliament for the activities of the Centre. FINTRAC was established by, and operates within, the ambit of the Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA) and its Regulations.

The Centre employs approximately 350 employees, and is headquartered in Ottawa. It's Montreal, Toronto and Vancouver regional offices have specific mandates related to compliance with the PCMLTFA. Shared Services Canada is mandated to manage FINTRAC's IT-infrastructure services related to e-mail, data centers and telecommunications.

#### **4.2 FINTRAC's Challenges and Opportunities**

Some of FINTRAC's challenges and opportunities in putting the Open Government Implementation Plan into action include:

- **Legislative constraints:** The PCMLTFA establishes stringent rules that govern both the management and disclosure of all information contained in the Centre's transaction reports and other records. The data and information inventory and review requirements related to Open Government represent an opportunity for the Centre to improve internal awareness and protection of these sensitive information resources.
- **Cultural change needed to support the move to "open":** FINTRAC needs to continue moving towards an environment that is more conducive to sharing data and information with Canadians. An opportunity exists to develop standards and guidelines to streamline the collection of data and information in the future, and to improve the quality, accuracy and clarity of this information. An opportunity also exists for the Centre to consume information and data released through Open Government to improve the products we produce in support of our mandate.
- **Reallocation of resources to address Open Government:** FINTRAC needs to reallocate existing human resources, and may need to reprioritize initiatives to implement the internal changes required to become compliant with the Directive on Open Government. This shift in focus will allow the Centre to further improve the value of its information through increased quality, usability and findability of its information and data holdings.

## 5. Outcomes

### Transforming our information culture

FINTRAC has a strong organizational culture with regards to the storage and protection of information and data. Due to the sensitivity of some of the information we maintain in support of our mandate, our five year legislative reviews, and biennial audits from the Office of the Privacy Commissioner, we continuously work to build upon these strong practices. A goal of our IM strategic direction is to close the gap between the information we have available and our ability to use it – implementing enhanced recordkeeping processes where required and improving our ability to find information when we need it. Implementing the Directive on Open Government will help us augment this goal by not only optimizing the value and reusability of our data and information internally, but also for the Government of Canada, and Canadians.

### Adopting and Integrating Open Data and Information Formats

Increasing FINTRAC's organizational familiarity with standard open data and information formats, and adjusting business processes to consider Open Government requirements when procuring, developing, or modernizing departmental information applications, systems, or solutions will better position the Centre to participate in Government of Canada initiatives, such as the Federal Geospatial Platform. This will also better position the Centre to leverage the breadth of information currently available free of charge on the Open Data portal in support of initiatives related to our mandate.

### Promoting transparency while enhancing public awareness of money laundering and terrorist activity financing

Increasing FINTRAC's proactive release of data and information as a result of an "open by default" end state, along with existing transparency initiatives FINTRAC is supporting today: proactive release of Privacy Impact Assessment Summaries, Completed Access to Information Act Request details, Proactive Disclosure of Contracts, Grants and Contribution Awards and Hospitality Expenses, will help ensure transparency on FINTRAC operations and enhance public awareness of money laundering and terrorist activity financing, while still protecting sensitive information at our disposal.

The *Access to Information Act* assumes the right of the public to access information collected and generated by federal departments and agencies; through the "open by default" perspective, this inherent right will be further supported and promoted. However, while the promotion of transparency and openness may reduce the number of requests from the public that are not relevant to the mandate and functions of FINTRAC (and thereby promoting

more efficiency within the agency), it may greatly increase the number of requests directly related to money laundering and terrorist financing, particularly as FINTRAC and its role moves further into the public sphere.

## 6. Governance Structures and Decision Processes

The following sub-sections describe the governance structures and decision processes that support open government and how those responsibilities are delegated and fulfilled within the institution.

### 6.1 Roles and Responsibilities – Deputy Head and Information Management Senior Official

The governance of the FINTRAC Open Government Implementation Plan (OGIP) is informed by the responsibilities identified for the Information Management Senior Official (IMSO) and Director in sections 6 (Requirements), 7 (Monitoring and Reporting Requirements), and 8 (Consequences) of the *Directive on Open Government*.

#### IMSO and Director

Role	OG Responsibilities
FINTRAC Director	<ul style="list-style-type: none"> <li>Approving of the Open Government Implementation Plan</li> <li>Supporting and committing to Open Government obligations</li> <li>Taking corrective measures within the organization with those responsible for implementing the requirements of this directive in instances of non-compliance.</li> </ul>
Information Management Senior Official (IMSO) and Chief Information Officer (CIO)	<p>The departmental IMSO, as designated by the Director, is responsible for the following:</p> <ul style="list-style-type: none"> <li>Overseeing the implementation and monitoring of the Directive on Open Government in the department;</li> <li>Working with key stakeholders, including heads of communications, departmental security officers (DSOs), data owners, functional specialists and access to information and privacy coordinators to ensure the implementation of the directive;</li> <li>Bringing to the Director's attention any significant difficulties, gaps in performance or compliance issues and developing proposals to address them;</li> <li>Ensuring that corrective actions are taken to address instances of non-compliance. Corrective actions can include additional training, changes to procedures and systems and other measures as appropriate; and</li> <li>Reporting any performance or compliance issues to the Chief Information Officer Branch of the Treasury Board of Canada Secretariat.</li> </ul>

#### Open Government Governance

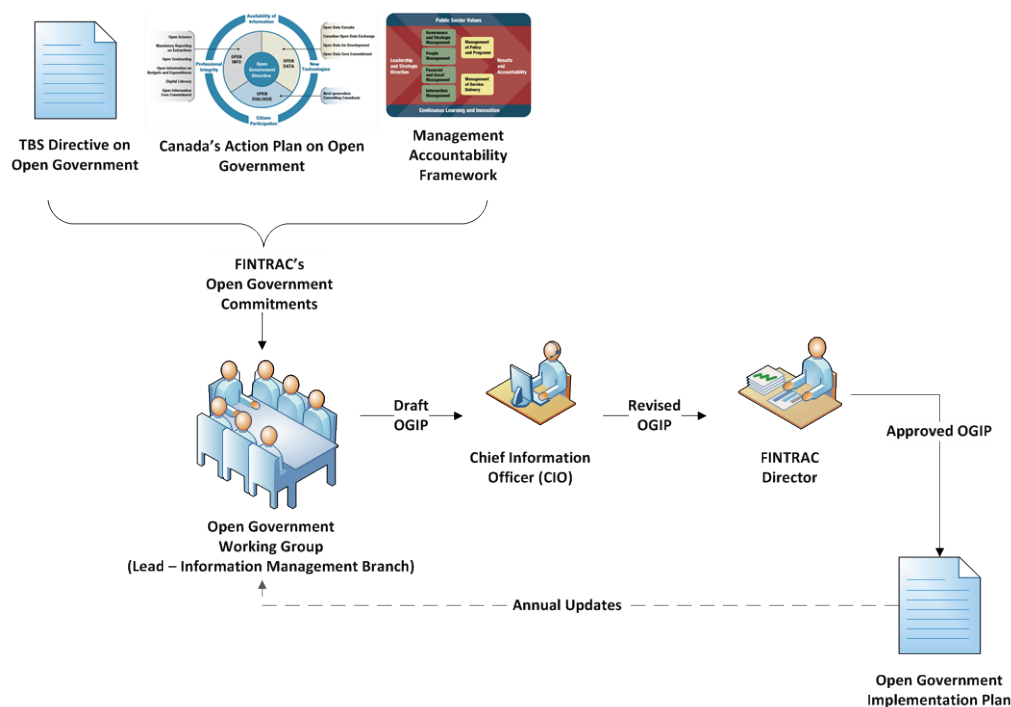
Committee	OG Responsibilities
FINTRAC Open Government Working Group (OGWG)	<p>The Open Government Working Group (OGWG) includes representatives with knowledge of FINTRAC programs, including Information Management, Communications, Access to Information and Privacy, Information Technology Security and business area information stewards.</p> <p>OGWG responsibilities include:</p> <ul style="list-style-type: none"> <li>Working with the program branches to develop and maintain FINTRAC's Open Government data and information inventory;</li> <li>Providing input, advice, and direction where appropriate on open government deliverables.</li> </ul>



Corporate Services Committee (CSC)	<p>The Corporate Services Committee (CSC) serves as FINTRAC's Information Governance Board. In addition to these responsibilities, the Corporate Services Committee contributes and provides oversight on strategic and program planning, priorities and reporting (finance, asset and real property, human resources and information technology) and on investment planning and reporting (including project updates).</p> <p>Open Government responsibilities include:</p> <ul style="list-style-type: none"> <li>• Keeping up to date with FINTRAC's Open Government progress</li> <li>• Providing input, advice, and direction where appropriate on Open Government deliverables and advancing these items to FINTRAC's Executive Committee for approval as required.</li> </ul>
Executive Committee (ExCo)	<p>The Executive Committee (ExCo) ensures the essential conditions—internal coherence, corporate discipline and alignment to outcomes—are in place for providing effective strategic direction, support to the minister, Parliament and Government of Canada priorities, and the delivery of cost effective results.</p> <p>For Open Government, ExCo is FINTRAC's senior executive committee, and may be deferred Open Government deliverables for approval by CSC.</p>

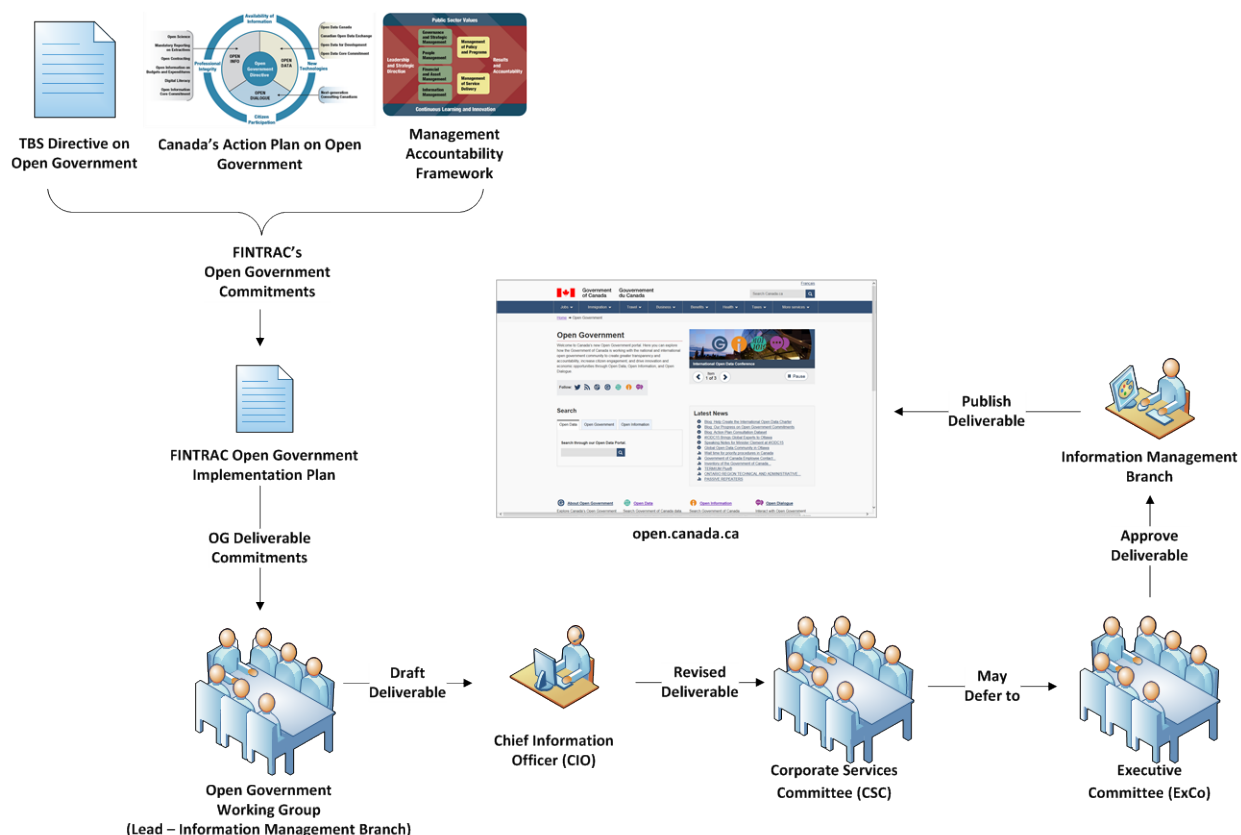
### Open Government Implementation Plan Governance

FINTRAC's plan to address the six Open Government requirements described in the Directive on Open Government will be formed from an analysis of Canada's Action Plan on Open Government 2014-2016 and associated Management Accountability Framework (MAF) requirements. The OGIP will be updated annually, through consultation with sectors throughout the Centre through the Open Government Working.



### Open Government Deliverables Governance





## 6.2 Roles and Responsibilities – Key Stakeholders

Role	OGIP Responsibilities
IM/IT, IM Branch	<ul style="list-style-type: none"> <li>Delivering, managing and annually updating the department's OGIP</li> <li>Mobilizing the department in achieving OGIP milestones (e.g., establishing consensus on objectives/deliverables; activity planning).</li> <li>Tracking and reporting on the progress and status of the OGIP and OG deliverables, and published datasets and information.</li> <li>Provisioning of OG compliance awareness, education, guidance and communication through the FINTRAC IM Awareness Program</li> <li>Maintaining FINTRAC information resource of business value (IRBV) inventories, including data and information resources which are candidates for release to the Open Government portal.</li> <li>Exploring how and when access restrictions may be removed from information resources of enduring value (IREV) prior to their transfer to LAC within the parameters of the Proceeds of Crime Money Laundering and Terrorist Financing Act (PCMLTFA)</li> <li>Publishing FINTRAC's datasets and information holdings so they are registered in the Open Government portal (open.canada.ca)</li> </ul>
Communications Branch	<ul style="list-style-type: none"> <li>Managing public enquiries related to FINTRAC supplied Open Government portal content, and reporting back to the Open Government Working group to ensure that public comments are properly addressed.</li> </ul>
Access to Information and	<ul style="list-style-type: none"> <li>Leading OG milestones regarding Access to Information Privacy (ATIP).</li> <li>Providing advice and guidance to information stewards when they are determining if</li> </ul>

Privacy Branch	<p>the datasets and information meet the Open Government Publishing Criteria, such as compliance with the Access to Information Act and Privacy Act.</p> <ul style="list-style-type: none"><li>• Exploring how and when access restrictions may be removed from information resources of enduring value (IREV) prior to their transfer to LAC within the parameters of the Proceeds of Crime Money Laundering and Terrorist Financing Act (PCMLTFA)</li></ul>
IT Security Branch	<ul style="list-style-type: none"><li>• Leading OG milestones regarding information security</li><li>• Providing advice and guidance to Business Owners when they are determining if the datasets and information meet the Open Government Publishing Criteria, such as compliance with the GC Policy on Security.</li><li>• Consulting with the Departmental Security Officer on security issues related to Open Government</li></ul>
Legal Services Branch	<ul style="list-style-type: none"><li>• Legal Services may be consulted by Information Stewards or the OG Working Group for advice and guidance regarding legal issues.</li></ul>
All Branches (Information Stewards)	<ul style="list-style-type: none"><li>• Information stewards are responsible for all datasets and information belonging to their program. They are responsible for identification and communication of datasets and information released to the IMSO for publishing</li><li>• Participating in FINTRAC's Open Government Working Group</li></ul>

### **6.3 Communication, Awareness, and Engagement**

FINTRAC has started an internal Open Government Working Group to raise awareness about Open Government within the Agency. This working group consists of functional specialists from IM, Access to Information and Privacy, Communications, Security as well as information stewards from the Agency's business areas.

FINTRAC is also working to incorporate elements of Open Government into the Centre's IM awareness program. The Centre's IM awareness program currently consists of:

- Mandatory IM Awareness Training sessions for new staff;
- Ongoing IM Awareness Training sessions for all staff;
- An information portal on our intranet for IM guidance and reference materials;
- IM participation in all projects related to procuring, developing, or modernizing departmental information applications, systems, or solutions.

The IM Awareness sessions and information portal will be augmented with new information specific to Open Government, explaining what it is, why it is important, and the value of Open Government to both the Agency and Canadians.

## 7. Planning Table

Ref.	Compliance Requirement	Deliverables / Milestones	Lead	Activities	Start Date	End Date	Resources (Human and Financial)	Status
DOG 6.1	Maximizing the release of Government of Canada data and information under an open and unrestrictive licence designated by the Treasury Board of Canada Secretariat	FINTRAC's Data Release Plan	IM/IT Branch	Develop and publish FINTRAC's Data Release Plan (pre-requisite: DOG 6.3 - Data Inventory)	Year 2 (2016)	Year 3 (2016)	Existing internal resources • IM Functional Specialist(s) • Information Technology Analyst(s)	Not Started
		FINTRAC's Information Release Plan	IM/IT Branch	Develop and publish FINTRAC's Information Release Plan (pre-requisite: DOG 6.3 - Information Inventory)	Year 3 (2017)	Year 4 (2018)	Existing internal resources • IM Functional Specialist(s) • Information Technology Analyst(s)	Not Started
DOG 6.2	Ensuring that open data and open information is released in accessible and reusable formats via Government of Canada websites and services designated by the TBS	Listing of accessible and reusable formats (for data and information) to be used at FINTRAC	IM/IT Branch	Develop and publish FINTRAC Open <b>Data</b> and <b>Information</b> Guidelines & Standards	Year 1 (2015)	Year 4 (2018)	Existing internal resources • IM Functional Specialist(s) • Information Technology Analyst(s)	Not Started
		Conversion process(es) for <b>data</b> identified for release whose native format is not accessible and reusable	IM/IT Branch	Develop FINTRAC Open <b>Data</b> conversion process(es)	Year 2 (2016)	Year 3 (2016)	Existing internal resources • IM Functional Specialist(s) • Information Technology Analyst(s)	Not Started
		Conversion process(es) for <b>information</b> identified for release whose native format is not accessible and reusable	IM/IT Branch	Develop FINTRAC Open <b>Information</b> conversion process(es)	Year 3 (2017)	Year 4 (2018)	Existing internal resources • IM Functional Specialist(s) • Information Technology Analyst(s)	Not Started
		Release process to support	IM/IT Branch	Review and enhance FINTRAC Open <b>Data</b>	Year 2	Year 2	Existing internal resources	Not Started

		the publication of <i>FINTRAC</i> 's data		release and publication process(es)	(2016)	(2016)	<ul style="list-style-type: none"> <li>• IM Functional Specialist(s)</li> <li>• Information Technology Analyst(s)</li> </ul>	
		Release process to support the publication of <i>FINTRAC</i> 's information	IM/IT Branch	Review and enhance FINTRAC Open <b>Information</b> release and publication process(es)	Year 3 (2017)	Year 4 (2018)	Existing internal resources <ul style="list-style-type: none"> <li>• IM Functional Specialist(s)</li> <li>• Information Technology Analyst(s)</li> </ul>	Not Started
DOG 6.3	Establishing and maintaining comprehensive inventories of data and information resources of business value held by the department to determine their eligibility and priority, and to plan for their effective release (6.3)	Methodology for establishing a data inventory	IM/IT Branch	Develop FINTRAC open <b>data</b> inventory templates and process(s)	Year 2 (2016)	Year 2 (2016)	Existing internal resources <ul style="list-style-type: none"> <li>• IM Functional Specialist(s)</li> <li>• Information Technology Analyst(s)</li> </ul>	Not Started
		Methodology for establishing an information inventory	IM/IT Branch	Develop FINTRAC open <b>information</b> inventory templates and process(s)	Year 3 (2017)	Year 4 (2018)	Existing internal resources <ul style="list-style-type: none"> <li>• IM Functional Specialist(s)</li> <li>• Information Technology Analyst(s)</li> </ul>	Not Started
		Data inventory (detailed, itemized list(s) that describe the volume, scope and complexity of the data held by <i>FINTRAC</i> )	IM/IT Branch	Develop FINTRAC <b>Data</b> Inventory	Year 1 (2015)	Year 3 (2017)	Existing internal resources <ul style="list-style-type: none"> <li>• IM Functional Specialist(s)</li> <li>• Information Technology Analyst(s)</li> <li>• Information Stewards</li> </ul>	Not Started
		Information inventory (detailed, itemized list(s) that describe the volume, scope and complexity of the information held by <i>FINTRAC</i> )	IM/IT Branch	Develop FINTRAC <b>Information</b> Inventory	Year 3 (2017)	Year 4 (2018)	Existing internal resources <ul style="list-style-type: none"> <li>• IM Functional Specialist(s)</li> <li>• Information Technology Analyst(s)</li> <li>• Information Stewards</li> </ul>	Not Started

		Renewal process(es) to maintain the currency of <i>FINTRAC</i> 's data inventory	IM/IT Branch	Develop FINTRAC open <b>data</b> inventory - renewal templates and process(s)	Year 2 (2016)	Year 3 (2017)	Existing internal resources • IM Functional Specialist(s) • Information Technology Analyst(s)	Not Started
		Renewal process(es) to maintain the currency of <i>FINTRAC</i> 's information inventory	IM/IT Branch	Develop FINTRAC open <b>information</b> - inventory renewal templates and process(s)	Year 3 (2017)	Year 4 (2018)	Existing internal resources • IM Functional Specialist(s) • Information Technology Analyst(s)	Not Started
		Assets included in the data inventory are evaluated to determine their eligibility and priority for release	IM/IT Branch	Develop FINTRAC <b>Data</b> Inventory – release eligibility and prioritization process(es)	Year 2 (2016)	Year 3 (2017)	Existing internal resources • IM Functional Specialist(s) • Information Technology Analyst(s) • IT Security Functional Specialist • Access to Information and Privacy Functional Specialist • Information Stewards	Not Started
		Assets included in the information inventory are evaluated to determine their eligibility and priority for release	IM/IT Branch	Develop FINTRAC <b>Information</b> Inventory – release eligibility and prioritization process(es)	Year 3 (2017)	Year 4 (2018)	Existing internal resources • IM Functional Specialist(s) • Information Technology Analyst(s) • IT Security Functional Specialist • Access to Information and Privacy Functional Specialist • Information Stewards	Not Started

DOG 6.4	Developing, posting to the designated website, implementing, and annually updating a departmental Open Government Implementation Plan (OGIP)	Governance structures are in place to oversee the implementation of <i>FINTRAC</i> 's OGIP	IM/IT Branch	Plan, develop and implement FINTRAC Open Government Governance	Year 1 (2015)	Year 2 (2016)	Existing internal resources • IM Functional Specialist(s)	In Progress
		<i>FINTRAC</i> 's Open Government Implementation Plan (OGIP)	IM/IT Branch	Co-ordinate and manage the development of FINTRAC's OGIP	Year 1 (2015)	Year 1 (2015)	Existing internal resources • IM Functional Specialist(s)	In Progress
		Signatures in section 2 (Approvals) of <i>FINTRAC</i> 's OGIP	IM/IT Branch	Develop approval process and obtain approval of FINTRAC OGIP	Year 1 (2015)	Year 1 (2015)	Existing internal resources • IM Functional Specialist(s)	In Progress
		<i>FINTRAC</i> 's OGIP is staffed and funded	IM/IT Branch	Prioritize, staff and fund FINTRAC OGIP activities	Year 1 (2015)	Year 5 (2019)	Existing internal resources • IM Functional Specialist(s)	In Progress
		Monitoring and reporting processes for assessing progress and maintaining the currency of the <i>FINTRAC</i> 's OGIP	IM/IT Branch	Monitor and report progress on FINTRAC OGIP	Year 1 (2015)	Year 5 (2019)	Existing internal resources • IM Functional Specialist(s)	In Progress
		<i>FINTRAC</i> 's first annual update to the OGIP	IM/IT Branch	Draft, translate and publish annual updates to FINTRAC's OGIP	Year 2 (2016)	Year 2 (2016)	Existing internal resources • IM Functional Specialist(s) • Translation Functional Specialist • Communications Functional Specialist	Not Started
		<i>FINTRAC</i> 's second annual update to the OGIP	IM/IT Branch	Draft, translate and publish annual updates to FINTRAC's OGIP	Year 3 (2017)	Year 3 (2017)	Existing internal resources • IM Functional Specialist(s) • Translation Functional Specialist • Communications Functional Specialist	Not Started

		FINTRAC's third annual update to the OGIP	IM/IT Branch	Draft, translate and publish annual updates to FINTRAC's OGIP	Year 4 (2018)	Year 4 (2018)	Existing internal resources • IM Functional Specialist(s) • Translation Functional Specialist • Communications Functional Specialist	Not Started
		FINTRAC's fourth annual update to the OGIP	IM/IT Branch	Draft, translate and publish annual updates to FINTRAC's OGIP	Year 5 (2019)	Year 5 (2019)	Existing internal resources • IM Functional Specialist(s) • Translation Functional Specialist • Communications Functional Specialist	Not Started
DOG 6.5	Maximizing the removal of access restrictions on departmental information resources of enduring value prior to transfer to Library and Archives Canada.	Methodology for the removal of access restrictions from data and information resources of enduring value prior to their transfer to the LAC	IM/IT Branch	Develop methodology to assess IREVs and remove access restrictions from IREVs where appropriate prior to transfer to LAC	Year 2 (2016)	Year 3 (2017)	Existing internal resources • IM Functional Specialist(s) • Information Technology Analyst(s) • IT Security Functional Specialist • Access to Information and Privacy Functional Specialist • Legal Functional Specialist • Information Stewards	Not Started
		Methodology for the removal of access restrictions from data and information resources of enduring value prior to their transfer to the LAC is integrated into	IM/IT Branch	Integrate into FINTRAC disposition processes the methodology to assess IREVs and remove of access restrictions when appropriate prior to transfer to LAC	Year 2 (2016)	Year 3 (2017)	Existing internal resources • IM Functional Specialist(s) • Information Technology Analyst(s) • IT Security Functional	Not Started



		FINTRAC's disposition plans and procedures.					Specialist <ul style="list-style-type: none"> <li>• Access to Information and Privacy Functional Specialist</li> <li>• Legal Functional Specialist</li> <li>• Information Stewards</li> </ul>	
DOG 6.6	Ensuring that open government requirements in sections 6.1 to 6.5 of this directive are integrated in any new plans for procuring, developing, or modernizing departmental information applications, systems, or solutions in support of the delivery of programs and services	Governance structures are in place to ensure that the requirements of the <i>Directive on Open Government</i> are integrated into any new plans for procuring, developing, or modernizing departmental information applications, systems, or solutions	IM/IT Branch	Review and adjust internal governance structures, as required, to integrate Open Government requirements into plans for procuring, developing or modernizing departmental information applications, systems, or solutions.	Year 2 (2016)	Year 2 (2016)	Existing internal resources <ul style="list-style-type: none"> <li>• IM Functional Specialist(s)</li> <li>• Information Technology Analyst(s)</li> </ul>	Not Started
		<i>Directive on Open Government</i> requirements are integrated into FINTRAC's procurement process(es) for information applications, systems, and solutions	IM/IT Branch	Integrate Open Government into FINTRAC <b>procurement processes</b> for application, systems and solutions	Year 2 (2016)	Year 4 (2018)	Existing internal resources <ul style="list-style-type: none"> <li>• IM Functional Specialist(s)</li> <li>• Procurement Functional Specialist(s)</li> <li>• Information Technology Analyst(s)</li> </ul>	Not Started
		<i>Directive on Open Government</i> requirements are integrated into FINTRAC's development process(es) for information applications, systems, and solutions	IM/IT Branch	Integrate Open Government into FINTRAC <b>development process(es)</b> for application, systems and solutions	Year 2 (2016)	Year 4 (2018)	Existing internal resources <ul style="list-style-type: none"> <li>• IM Functional Specialist(s)</li> <li>• Information Technology Analyst(s)</li> </ul>	Not Started
		<i>Directive on Open Government</i> requirements are integrated into FINTRAC's modernizing process(es) for information applications, systems, and solutions	IM/IT Branch	Integrate Open Government into FINTRAC <b>modernization process(es)</b> for application, systems and solutions	Year 2 (2016)	Year 4 (2018)	Existing internal resources <ul style="list-style-type: none"> <li>• IM Functional Specialist(s)</li> <li>• Information Technology Analyst(s)</li> </ul>	Not Started

DOG 7.1	Departmental information management senior officials, as designated by the deputy heads, are responsible for overseeing the implementation and monitoring of this directive in their department.	Performance framework for the monitoring of <i>FINTRAC</i> 's progress against the activities and deliverables / milestones in the OGIP	IM/IT Branch	Establish performance framework to monitor <i>FINTRAC</i> 's progress against the activities and deliverables / milestones in the OGIP	Year 2 (2016)	Year 3 (2017)	Existing internal resources • IM Functional Specialist(s)	Not Started
		Progress against the activities and deliverables / milestones in the OGIP is regularly reported to the governance structures in place to oversee the implementation	IM/IT Branch	Implement OGIP performance reporting	Year 2 (2016)	Year 5 (2019)	Existing internal resources • IM Functional Specialist(s)	Not Started
		Performance framework for the monitoring of <i>FINTRAC</i> 's ongoing compliance to the requirements of the Directive	IM/IT Branch	Plan and implement Compliance management	Year 2 (2016)	Year 2 (2016)	Existing internal resources • IM Functional Specialist(s)	Not Started
		Process to ensure significant difficulties, gaps in performance, or compliance issues are reported to the Deputy Head (DH)	IM/IT Branch	Implement OGIP performance reporting	Year 2 (2016)	Year 2 (2016)	Existing internal resources • IM Functional Specialist(s)	Not Started