Santé

Canada

# **Health Canada Privacy Act Annual Report** 2016-2017



2016-2017 Annual Report on the *Privacy Act* is available on the Health Canada web site.

Également disponible en français sur le site Web de Santé Canada sous le titre : Rapport annuel 2016-2017 sur la Loi sur la protection des renseignements personnels.

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#### INTRODUCTION

#### I. Privacy Act

The *Privacy Act* (the *Act*) gives Canadian citizens and permanent residents of Canada the right of access to information about themselves held by the federal government with certain specific and limited exceptions. The *Act* protects an individual's privacy by setting out provisions related to the collection, retention, accuracy, disposal, use and disclosure of personal information.

The *Act* requires the head of every federal government institution to submit an annual report to Parliament on the administration of the *Act* following the close of each fiscal year. This annual report is prepared and is being tabled before each House of Parliament in accordance with section 72 of the *Act*. This report summarizes how Health Canada has fulfilled its privacy responsibilities during the fiscal year 2016-2017.

#### II. About Health Canada

Health Canada (HC) is the federal department responsible for helping the people of Canada maintain and improve their health.

HC is committed to improving the lives of all of Canada's people and to making this country's population among the healthiest in the world as measured by longevity, lifestyle and effective use of the public health care system.

By working with others in a manner that fosters the trust of Canadians, HC strives to:

- Prevent and reduce risks to individual health and the overall environment;
- Promote healthier lifestyles;
- Ensure high quality health services that are efficient and accessible;
- Integrate renewal of the health care system with longer term plans in the areas of prevention, health promotion and protection;
- Reduce health inequalities in Canadian society; and
- Provide health information to help Canadians make informed decisions.

HC has regional offices in British Columbia, Alberta, Saskatchewan, Manitoba, Ontario, Quebec, and the Atlantic and Northern Regions.

For more information about HC, please visit our website at: <a href="http://www.hc-sc.gc.ca/index-eng.php">http://www.hc-sc.gc.ca/index-eng.php</a>

#### PRIVACY DELIVERY AND GOVERNANCE

Privacy protection and the appropriate management of personal information, including personal health information, are extremely important for Canadians and HC. The Department takes its role in the management of personal information seriously and has taken steps to raise awareness and implement processes to comply with the *Privacy Act*. These are outlined in this report.

*Privacy Act* requirements are led out of the Privacy Management Division and the Access to Information and Privacy Management Division. Both Divisions are housed in the Planning, Integration and Management Services Directorate of the Corporate Services Branch at HC.

In 2016-2017, the *Act* was administered at HC by 19.13 full-time equivalent (FTE) employees with the support of 2.36 FTEs in consultant services, as well as some part-time and casual employees at 0.72 FTEs for a total resource complement of 22.21 FTEs. These figures include administrative support, management, reporting, monitoring and policy resources, and overhead cost which contribute to the overall support of the operations of the application of the *Act*.

#### I. Privacy Management Division

The Privacy Management Division strengthens capacity and expertise supporting HC's programs that collect, use, disclose, retain and dispose of personal information.

The Division's key areas of work include:

- Developing corporate privacy policies, guidelines and practices that promote a culture of privacy;
- Actively promoting privacy awareness through both on-line and in-person training;
- Integrating privacy considerations into the investment planning process;
- Working with programs to complete, monitor and report on privacy impact assessments and privacy breaches;
- Reviewing Memorandum to Cabinet and Treasury Board submissions to ensure privacy requirements are met;
- Coordinating HC annual input into Info Source, including the development and registration of Personal Information Banks;
- Liaising with the Office of the Privacy Commissioner of Canada on privacy aspects of new and proposed programs, legislation/regulations, policies, privacy impact assessments, breaches and complaints;
- Monitoring privacy policies, practices; and
- Liaising with other federal departments, agencies, provincial ministries of health and other key partners regarding privacy issues within the health portfolio to provide informed advice to clients.

#### II. The Access to Information and Privacy Division

The management of requests and associated complaints under the *Privacy Act* is jointly led by the Access to Information Division and the Privacy Management Division. These Divisions are responsible for legislative requirements pursuant to the *Act* such as:

- Responding to privacy requests within the statutory time frame as well as meeting the duty to assist requesters;
- Promoting staff awareness and providing training across HC on the *Act*;
- Preparing the Annual Report to Parliament;
- Supporting other forms of information sharing by HC by ensuring the appropriate identification and redaction of personal information (e.g., documents for litigation, information disclosure, and relating to human resource issues); and
- Liaising with the Office of the Privacy Commissioner (OPC), Treasury Board of Canada Secretariat (TBS), other federal departments and agencies, provincial ministries of health and other key partners regarding the application of the *Act* to develop relevant policies, tools and guidelines.

#### **DELEGATION OF AUTHORITY**

The most recent delegation order for the *Privacy Act* was signed by the Minister of Health on November 25, 2015. In keeping with Treasury Board Secretariat recommendations on best practice, the delegation order extends authorities to multiple positions including the Coordinator, the Corporate Services Branch's Assistant Deputy Minister and Director General of Planning Integration and Management Services Directorate. As appropriate, certain administrative authorities are delegated to various senior levels within the ATIP Division and Privacy Management Division to support the effective and efficient administration of the *Act*.

The Delegation Order is attached as Appendix A.

# REQUESTS UNDER THE *PRIVACY ACT* - STATISTICAL FIGURES, INTERPRETATION AND EXPLANATION

#### I. Statistical Report

This section of the report includes an interpretation and explanation of the data contained in HC's statistical report which summarizes privacy-related activity for the period between April 1, 2016 and March 31, 2017 (Appendix B).

#### II. Number of Privacy Requests and Case Load

#### Requests under the Privacy Act

For fiscal year 2016-2017, the number of privacy requests received dipped to 269 compared to 531 in 2015-2016, representing a 49% decrease in the number of requests. Some of the reduction can be attributed to work that was performed with the Regions to

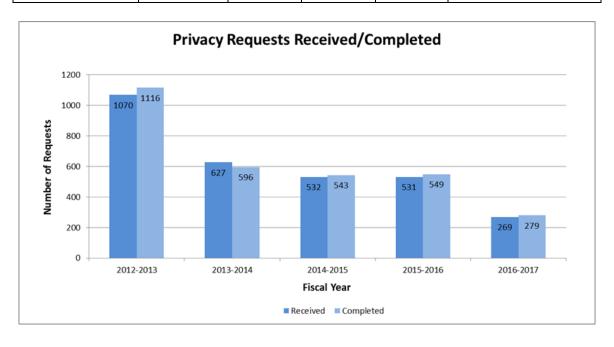
disclose records directly to individuals without a formal request whenever feasible. A significant proportion of the privacy requests relate to individuals seeking medical records as part of Indian Residential Schools. Although these continue to represent the largest component of the requests received, they have been declining in number. The Department also receives a significant number of requests from current or past HC employees looking for their own personal information.

#### **Case Load**

For 2016-2017, active requests included 269 new requests and 50 requests carried over from fiscal year 2015-2016. During fiscal year 2016-2017, HC completed the processing of 279 requests, representing 103% of the annual volume of requests received (269), and 87% of all active requests (319). Forty (40) requests are being carried over into the 2017-2018 fiscal year.

#### CASE LOAD AND PAGES REVIEWED BY FISCAL YEAR

Fiscal Year	Number of Requests Received	Number of Requests Carried Over	Total Caseload	Number of Requests Closed	# of Pages Reviewed for Closed Files
2012-2013	1070	93	1991	1116	172,686
2013-2014	627	48	675	596	86,338
2014-2015	532	79	611	543	81,385
2015-2016	531	68	599	549	36,748
2016-2017	269	50	319	279	13,305



#### **Consultations Received from Other Government Institutions**

In 2016-2017, HC completed a total of seven consultations (190 pages) from other federal government departments. No consultations were carried over to the new fiscal period.

## NUMBER OF CONSULTATIONS AND PAGES REVIEWED FROM OTHER FEDERAL INSTITUTIONS

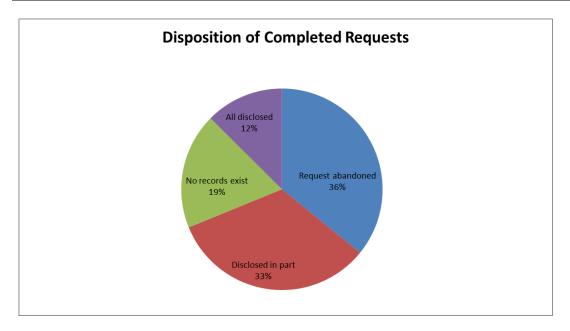
Federal Institutions	Number of Consultations Completed	Pages Reviewed
Public Health Agency of Canada	3	187
Canadian Security Intelligence Service	1	2
Canadian Border Services Agency	1	1
Other	2	5
Total	7	195

## III. Disposition of Requests Completed

Completed requests were classified as follows:

#### **DISPOSITION OF REQUESTS COMPLETED BY PERCENTAGE**

Disposition of Requests	Requests Completed by Percentage
All disclosed	12%
Disclosed in part	33%
No records exist	19%
Request abandoned	36%



The percentage of 'All Disclosed' files reduced by 16% from 2015-2016 and can be further attributed to the work that was performed with the Regions to disclose records directly to individuals without a formal request whenever feasible.

While HC has a high number of abandoned privacy requests, this is primarily due to confusion from the general public about the Department's mandate and records holdings. Most of the requests that HC reported as "closed as abandoned" were received online and were seeking personal medical records that fall within provincial jurisdiction and are not under the control of HC. Since HC does not hold this information, requesters were notified accordingly.

#### IV. Exemptions Invoked

Sections 18 through 28 of the *Act* set out the exemptions intended to protect information pertaining to a particular public or private interest. Section 26 "personal information of other individuals" accounted for 93% of the all exemptions invoked in 2016-2017.

#### PRINCIPAL EXEMPTIONS APPLIED

Exemptions	Number of Times Applied
Section 26 – Information about another individual	90
Section 27 – Solicitor-client privilege	3
Section 25 – Safety of individuals	2
Section 22(1) – Law enforcement and investigation	1
Section 19(1)(a) – Obtained in confidence from a foreign state	1

#### V. Exclusions Cited

The *Act* does not apply to personal information that is available to the public (section 69), nor does it apply to confidences of the Queen's Privy Council (section 70), with some exceptions. Requests containing proposed exclusions under section 70 require consultation with the Department of Justice, and potentially the Privy Council Office. In 2016-2017, HC did not exclude any information under either section 69 or 70.

#### VI. Completion Time

HC tracks the disposition of closed requests and the length of time taken to process them. Of the total caseload of 319 requests, HC completed 279 cases and carried over 40 active requests to fiscal year 2017-2018.

HC was able to respond within 30 days or less in 249 (89%) of completed cases, a 6% increase from 2015-2016. Of the remaining requests, 18 (6%) were completed in 31 to 60 days; 7 (3%) in 61 to 120 days, and 5 (2%) in 121 days or more.

#### VII. Extensions

Legal extensions were invoked in 18 cases (6%) of the total 279 requests completed.

#### VIII. Translation

There were no requests for translation of records responsive to *Privacy Act* requests in 2016-2017.

#### IX. Format of Information Released

Of requests that were fully or partially disclosed, 75 were sent out in paper format. Comparatively, 52 requests were released electronically.

HC's imaging software allows the Department to respond to privacy requests using Portable Document Format (PDF). It is anticipated that the use of electronic formats for the release of information will continue to grow in future years.

#### X. Corrections and Notations

There were no requests for the correction or the notation of personal information during this fiscal year.

#### XI. Costs

HC spent a total of \$1,977,422 responding to requests related to the *Act*. Of this total: salaries accounted for \$1,486,199 and administration costs accounted for \$475,382, most of which was used to retain temporary help to address the volume and complexity of requests.

#### TRAINING AND AWARENESS

#### Training, Orientation and Awareness for HC Employees

HC continues to offer privacy training through 'Privacy 101' sessions. General Privacy awareness training was provided to 59 employees during the year. These sessions provide participants with a high level understanding of the *Privacy Act* and its requirements relating to the processing of requests for information under the *Privacy Act*, the "need to know" principle, and general obligations regarding the collection, use, retention, disclosure and retention of personal information.

Several new training sessions were offered this fiscal year including Privacy Impact Assessment Boot Camp and a new privacy breach session developed to assist in the prevention of privacy breaches. Total participation in these additional training sessions were 62 participants. Further, an online learning tool – Privacy Basics - continued to be used in 2016-2017. Total on-line participants for the year were 278.

Overall, 399 HC employees received privacy training in 2016-2017.

In addition, HC continues to increase privacy awareness among employees and of their responsibilities under the *Privacy Act* through targeted information sessions. These included promoting Privacy Day in January and Privacy Awareness Week in May, where communication and general awareness messages were sent through internal communication channels. The Privacy Management Division continued to use a Twitter account and had 200 followers as of year-end.

#### **RECENT PRIVACY INITIATIVES**

The Privacy Management Division completed a pilot project aimed at improving the completion of Privacy Impact Assessments (PIA). During the pilot, which dedicated internal staff resources to the writing of PIAs, four (4) PIAs were approved and submitted to OPC and TBS during 2016-2017, doubling the number of PIAs completed in the previous year.

HC is pursuing a plan to add capacity to this function going forward.

# New and/or Revised Institution-Specific Privacy-Related Policies, Guidelines and Procedures

#### I. Privacy Management Division

The Privacy Management Division, with the assistance of other departments, completed a privacy online training resource accessible to government institutions and stakeholders that covers the key federal requirements for the collection, use, retention, disclosure and disposal of personal information, as well as specific modules on privacy oversight, privacy breach management and PIAs. This module was made available in April 2016, with 278 participants across government completing the online training module in the fiscal year.

#### **II. Other Initiatives**

#### **Governance and Outreach**

There is an ongoing focus on engagement through meetings with employees across the Department, central agencies and other government departments. For example, in 2016-2017, three (3) meetings of the Health Partnership Privacy Committee (HPPC) were held to promote privacy issues. As a director-level forum with representation from all areas of HC, the HPPC generates discussion and approval of privacy guidance, practices and tools, collaborates in ensuring that privacy compliance requirements are met, and makes recommendations to senior management.

#### **Health Information Privacy Group**

HC continues to participate as a member of the Canada Health Infoway's Federal-Provincial Territorial Health Information Privacy Working Group focused on privacy issues related to the development digital health services in Canada. In 2016-2017, HC participated in 2 in person meetings as well as 3 conference calls.

# KEY ISSUES RAISED AS A RESULT OF PRIVACY COMPLAINTS AND/OR INVESTIGATIONS

#### I. Complaints to the Privacy Commissioner

Two (2) complaints were received under Section 31 related to the processing of *Privacy Act* requests by HC. Two (2) Section 33 notices were sent by the OPC to the Department; these notices provide the opportunity to make formal representations relating to active investigations. Lastly, one (1) Letter of Finding (Section 35) relating to complaints was received from the OPC.

#### II. Types of Complaints and their Disposition Completed

During 2016-2017, three investigations into complaints that related to the processing of *Privacy Act* requests were completed and closed by the OPC. All 3 findings were well-founded.

Similarly, two (2) new complaints were received related to the way the department managed personal information as well as two (2) related written submissions for clarifications from the OPC. Finally, one (1) well founded finding was received from the OPC related to a complaint initiated in 2013.

The Department reviews the outcomes of all OPC investigations, and where appropriate, incorporates lessons learned into business processes.

#### III. Applications/Appeals Submitted to the Federal Court/Federal Court of Appeal

There were no applications or appeals submitted to the Federal Court or the Federal Court of Appeal during fiscal year 2016-2017.

## IV. Health Canada Responses to Recommendations raised by other Agents of Parliament

There were no recommendations raised by other Agents of Parliament during fiscal year 2016-2017.

#### V. Privacy Audits

There were no privacy audits concluded during fiscal year 2016-2017 for HC.

#### MONITORING COMPLIANCE

ATIP has undertaken the production of weekly, monthly and quarterly reporting to Senior Management in order to monitor performance within HC. Similarly, PMD produces quarterly reports on privacy breaches and privacy impact assessments.

#### **PRIVACY BREACHES**

Health Canada assessed 29 privacy breaches during this fiscal year that affected individuals. The majority of the breaches were of low to medium sensitivity and were caused by human error. Two breaches were determined to be "material breaches' and were reported to the Office of the Privacy Commissioner of Canada and the Treasury Board Secretariat (TBS), as required by TBS Policy.

#### PRIVACY IMPACT ASSESSMENTS COMPLETED

Four (4) privacy impact assessments were completed during the 2016-2017 fiscal year. Below are the PIAs listed with a brief description along with a hyperlink to the PIA on the HC website where available. For additional information regarding PIAs not yet posted to the HC website, please contact: <a href="https://hc.privacy-vie.privee.sc@canada.ca">hc.privacy-vie.privee.sc@canada.ca</a>

- 1. Indian Residential Schools Resolution Health Support Program The purpose of the Indian Residential Schools Resolution Health Support Program (IRS RHSP) Privacy Impact Assessment (PIA) was to assess, reduce and mitigate potential privacy risks related to the collection, use, dissemination, disclosure, retention, and disposal of personal information for existing processes that are in place for the administration of the IRS RHSP.
- **2. Marihuana for Medical Purposes** This PIA was completed to identify privacy risks associated with the collection and management of personal information by HC in support of the implementation of the Marihuana for Medical Purposes Regulations.
- **3. Grants and Contributions Management System (GCIMS) PIA** GCIMS is a web-enabled transfer payment management system that automates the Department's transfer payment business processes and manages funding agreement information. The PIA assessed HC's collection, use, disclosure and retention of personal information involved in the basic GCIMS business processes.
- 4. Requests for Disclosures of Confidential Business Information <a href="http://www.hc-sc.gc.ca/ahc-asc/activit/atip-aiprp/priv-prot/pia-efvp-j-eng.php">http://www.hc-sc.gc.ca/ahc-asc/activit/atip-aiprp/priv-prot/pia-efvp-j-eng.php</a>
  This PIA was completed as personal information is used to make an administrative decision as to whether Confidential Business Information can be disclosed to an individual. The PIA examines the privacy-related risks of the disclosure of CBI under the *Food and Drugs Act* and proposes methods to lower these risks.

# DISCLOSURES MADE PURSUANT TO PARAGRAPH 8(2)(E) OF THE PRIVACY ACT

Five (5) disclosures were provided to federal investigative bodies. Four (4) were provided to Royal Canadian Mounted Police and one (1) was provided to the Department of National Defence Board of Inquiry.

# DISCLOSURES MADE PURSUANT TO PARAGRAPH 8(2)(M) OF THE PRIVACY ACT

No public interest disclosures of personal information were made during the reporting period.

# APPENDIX A: Access to Information Act and Privacy Act – Delegation Order

**Delegation of Authority** 

Access to Information Act and Privacy Act

I, the Minister of Health, pursuant to section 73 of the *Access to Information Act* and section 73 of the *Privacy Act*, hereby designate the persons holding the positions set out in the Delegation of Authority Schedule attached hereto, or the persons occupying on an acting basis those positions, to exercise the powers, duties and functions of the Minister responsible for Health Canada, under the provisions of the *Act* and related regulations set out in the schedule opposite each position. This designation supersedes all previous delegation orders.

L'ordonnance de délégation des pouvoirs

Loi sur l'accès à l'information et Loi sur la protection des renseignements

En ma qualité de ministre de la Santé et en vertu de l'article 73 de la Loi sur l'accès à l'information et de l'article 73 de la Loi sur la protection des renseignements personnels, je délègue par la présente aux titulaires des postes énoncés à l'annexe de délégation de pouvoirs ci-après, ou aux personnes occupant les dits postes à titre intérimaire, les attributions dont je suis investie, à titre de ministre de responsable de Santé Canada, aux termes des dispositions des lois et des règlements connexes mentionnés en regard de chaque poste. Le présent document remplace toute ordonnance de délégation de pouvoirs antérieure.

Minister of Health Ministre de la Santé

Date

Delegation of Authority Schedule / Annexe de délégation de pouvoirs						
Position /Poste	Access to Information Act and Regulations / Loi sur l'accès à l'information et règlements	Privacy Act and Regulations / Loi sur la protection des renseignements personnels et règlements				
Assistant Deputy Minister, Corporate Services Branch / Sous-ministre adjoint, Direction générale des services de gestion	Full authority / Autorité absolue	Full authority / Autorité absolue				
HC/PHAC SC/ASPC						
Director General, Planning, Integration and Management Services, Corporate Services Branch / Directeur (trice) général(e), Direction de la planification, de l'intégration et des services de gestion, Direction générale des services de gestion	Full authority / Autorité absolue	Full authority / Autorité absolue				
HC/PHAC SC/ASPC						
Director (Coordinator), Access to Information and Privacy / Directreur (trice) (Coordonnateur) (trice)), Accès à l'information et protection des renseignements personnels	Full authority / Autorité absolue	Full authority except / Autorité absolue sauf Sections/Articles 8(2)(j), 8(2)(m), 8(5), 9(1), 9(4), 10				
HC/PHAC SC/ASPC						
Deputy Director, Access to Information and Privacy/Directeur (trice), Accès à l'information et protection des renseignements personnels	Full authority / Autorité absolue	Full authority except / Autorité absolue sauf Sections/Articles 8(2)(j), 8(2)(m), 8(5), 9(1), 9(4), 10				
Director, Privacy Management Division/Directeur (trice) Division de la gestion de la protection des renseignements personnels	nil	Full authority except / Autorité absolue sauf Sections/Articles 14-28 inclusively/inclusivement				
Chief, Access to Information and Privacy / Chef, Accès à l'information et de la protection des renseignements personnels	Full authority except/ Autorité absolue sauf: : 35(2), 52(2)(b), 52(3), 72 Regulations / Règlements: Sections / Articles: Full authority / Autorité absolue	Full authority except/ Autorité absolue sauf: 8(2)(j), 8(2)(m), 8(4), 8(5), 9(1), 9(4), 10, 33(2) 51(2)(b), 51(3), 72(1) Regulations / Règlements : Sections / Articles : Full authority except Autorité absolue sauf : 7				
Team Leader, Access to Information and Privacy / Chef d'équipe Accès à l'information et de la protection des renseignements personnels	Sections / Articles : 4(2.1), 7, 8(1), 9(1), 9(2), 10(1), 10(2), 11(2), 11(3), 11(4), 11(5), 11(6), 12(2)(b), 12(3)(b), 19, 25, 27(1), 27(4), 33, 43(1), 44(2) Regulations / Règlements : Sections / Articles : Full authority / Autorité absolue	Sections / Articles : 14, 15, 16, 17(2)(b), 17(3)(b), 26, 31 Regulations / Règlements : Sections / Articles : 9, 11(2), 13(1), 14				
Senior Analyst, Access to Information and Privacy / Analyste principal, Accès à l'information et de la protection des renseignements personnels	Sections / Articles : 4(2.1), 7, 9(2), 27(1), 27(4), 33 Regulations / Règlements : Sections / Articles : 5	Regulations / Règlements : Sections / Articles : 9, 11(2)				
Analyst, Access to Information and Privacy / Analyste, Accès à l'information et de la protection des renseignements personnels	Sections / Articles : 4(2.1), 7, 9(2) Regulations / Règlements : Sections / Articles : 5	Regulations / Règlements : Sections / Articles : 9, 11(2)				

## APPENDIX B: STATISTICAL REPORT ON THE PRIVACY ACT

**TBS/SCT 350-63** 

Name of institution: Health Canada

**Reporting period:** 2016-04-01 to 2017-03-31

## Part 1: Requests Under the *Privacy Act*

	Number of Requests
Received during reporting period	269
Outstanding from previous reporting period	50
Total	319
Closed during reporting period	279
Carried over to next reporting period	40

## Part 2: Requests Closed During the Reporting Period

## 2.1 Disposition and completion time

	Completion Time							
Disposition of Requests	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
All disclosed	12	19	3	1	0	0	0	35
Disclosed in part	9	58	15	6	2	2	0	92
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	30	22	0	0	0	0	0	52
Request abandoned	77	22	0	0	0	1	0	100
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	128	121	18	7	2	3	0	279

## 2.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(a)(i)	0	23(a)	0
19(1)(a)	1	22(1)(a)(ii)	0	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	1	24(a)	0
19(1)(c)	0	22(1)(b)	0	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	2
19(1)(e)	0	22(2)	0	26	90
19(1)(f)	0	22.1	0	27	3
20	0	22.2	0	28	0
21	0	22.3	0		

## 2.3 Exclusions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
69(1)(a)	0	70(1)	0	70(1)(d)	0
69(1)(b)	0	70(1)(a)	0	70(1)(e)	0
69.1	0	70(1)(b)	0	70(1)(f)	0
_		70(1)(c)	0	70.1	0

#### 2.4 Format of information released

Disposition	Paper	Electronic	Other formats
All disclosed	26	9	0
Disclosed in part	49	43	0
Total	75	52	0

## 2.5 Complexity

## 2.5.1 Relevant pages processed and disclosed

Disposition of Requests	Number of Pages Processed	Number of Pages Disclosed	Number of Requests
All disclosed	640	640	35
Disclosed in part	12440	12503	92
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	225	0	100
Neither confirmed nor denied	0	0	0
Total	13305	13143	227

## 2.5.2 Relevant pages processed and disclosed by size of requests

	Less Than Pages Proce		_	-500 ges essed	501-1000 Pages Processed		Pages Pages		More Than 5000 Pages Processed	
Disposition	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclose d	Number of Request s	Pages Disclosed	Number of Request s	Pages Disclosed	Number of Request s	Pages Disclosed
All disclosed	34	424	1	216	0	0	0	0	0	0
Disclosed in part	63	2873	23	4967	5	3531	1	1132	0	0
All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	99	0	1	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	196	3297	25	5183	5	3531	1	1132	0	0

## 2.5.3 Other complexities

Disposition	Consultation Required	Legal Advice Interwov Sought Informati		Other	Total
All disclosed	0	0	0	1	1
Disclosed in part	5	0	0 2		7
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0
Total	5	0	0	3	8

## 2.6 Deemed refusals

## 2.6.1 Reasons for not meeting statutory deadline

Number of Requests Closed Rest	Principal Reason					
Number of Requests Closed Past the Statutory Deadline	Workload	External Consultation	Internal Consultation	Other		
19	10	1	1	7		

## 2.6.2 Number of days past deadline

Number of Days Past Deadline	Number of Requests Past Deadline Where No Extension Was Taken	Number of Requests Past Deadline Where An Extension Was Taken	Total
1 to 15 days	5	2	7
16 to 30 days	2	0	2
31 to 60 days	1	3	4
61 to 120 days	2	1	3
121 to 180 days	0	0	0
181 to 365 days	3	0	3
More than 365 days	0	0	0
Total	13	6	19

## 2.7 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	0	0	0
Total	0	0	0

## Part 3: Disclosures Under Subsections 8(2) and 8(5)

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Subsection 8(5)	Total
5	0	0	5

## Part 4: Requests for Correction of Personal Information and Notations

Disposition for Correction Requests Received	Number
Notations attached	0
Requests for correction accepted	0
Total	0

## **Part 5: Extensions**

#### 5.1 Reasons for extensions and disposition of requests

	15(a)(i) Interference	15(a Consu	15(b)	
Disposition of Requests Where an Extension Was Taken	With Operations	Section 70	Other	Translation or Conversion
All disclosed	0	0	0	0
Disclosed in part	5	0	13	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	0	0	0	0
Request abandoned	0	0	0	0
Total	5	0	13	0

#### **5.2 Length of extensions**

	15(a)(i)	15(a Consu	15(b)	
Length of Extensions	Interference with operations	Section 70	Other	Translation purposes
1 to 15 days	0	0	0	0
16 to 30 days	5	0	13	0
Total	5	0	13	0

## Part 6: Consultations Received From Other Institutions and Organizations

## 6.1 Consultations received from other Government of Canada institutions and other organizations

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during the reporting period	7	195	0	0
Outstanding from the previous reporting period	0	0	0	0
Total	7	195	0	0
Closed during the reporting period	6	190	0	0
Pending at the end of the reporting period	1	5	0	0

## **6.2** Recommendations and completion time for consultations received from other Government of Canada institutions

	Number of Days Required to Complete Consultation Requests						quests	
Recommendation	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
All disclosed	1	2	0	0	0	0	0	3
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	3	0	0	0	0	0	0	3
Total	4	2	0	0	0	0	0	6

# 6.3 Recommendations and completion time for consultations received from other organizations

	Number of days required to complete consultation requests						uests	
Recommendation	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Dday s	More Than 365 Days	Total
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

## Part 7: Completion Time of Consultations on Cabinet Confidences

## 7.1 Requests with Legal Services

	Fewer Than 10 Process	_		) Pages essed	Pa	1000 ges essed	Pa	-5000 ges essed	Pa	an 5000 ges essed
Number of Days	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclose d	Number of Request s	Pages Disclosed	Number of Request s	Pages Disclosed	Number of Request s	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

## 7.2 Requests with Privy Council Office

	Fewer Than 10 Process	_	101–500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
Number of Days	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclose d	Number of Request s	Pages Disclosed	Number of Request s	Pages Disclosed	Number of Request s	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

## Part 8: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
2	2	1	0	5

## Part 9: Privacy Impact Assessments (PIAs)

## Part 10: Resources Related to the Privacy Act

## 10.1 Costs

Expenditures		Amount
Salaries		\$1,486,199
Overtime		\$15,841
Goods and Services		\$475,382
Professional services contracts	\$391,970	
• Other	\$83,412	
Total		\$1,977,422

#### 10.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	19.13
Part-time and casual employees	0.72
Regional staff	0.00
Consultants and agency personnel	2.36
Students	0.00
Total	22.21