

Health Canada Privacy Act Annual Report 2017-2018



2017–2018 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 2017–2018 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 2017-2018.

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: https://www.canada.ca/en/health-canada.html

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 2017–2018, the *Act* was administered at HC by 16.04 full-time equivalent (FTE) employees with the support of 1.40 FTEs in consultant services, as well as part-time and casual employees of 0.79 FTEs for a total resource complement of 18.23 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 (PMD) 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 and Privacy Division and the Privacy Management Division. Together, 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 Health Canada's statistical report that summarizes ATI-related activity for the period between April 1, 2017, and March 31, 2018 (Appendix B).

In August 2017, the Prime Minister announced an action plan to dissolve Indigenous and Northern Affairs Canada (INAC) and create two departments: Indigenous Services Canada (ISC) and Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). ISC was officially created with an order on November 30, 2017, and all employees of the

First Nations and Inuit Health Branch (FNIHB) of Health Canada (HC) were transferred to that new department.

Although FNIHB was transferred to ISC on November 30, 2017, through a memorandum of understanding, HC continued to provide internal services until March 31, 2018 including processing privacy requests associated with FNIHB. From November 30, 2017, until March 31, 2018, HC working on behalf of ISC, administered the requests received for FNIHB-related files. This arrangement helped support continued access to information until the transition on April 1, 2018.

HC processed six *Privacy Act* requests in the name of the ISC, which are included in HC's statistical report. Of those six requests, HC completed two before April 1, while the four others were transferred to ISC for completion.

II. Number of Privacy Requests and Case Load

Requests under the Privacy Act

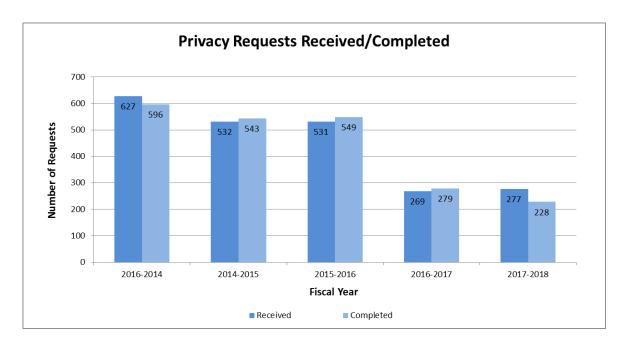
In 2017–2018, HC processed 237 *Privacy Act* requests compared to 269 in 2016–2017, a 12% decrease. Many of these requests were for requesters access to medical files. HC also received a significant number of requests from current and former HC employees who wanted to obtain their personal information which can often lead to complexities in retrieving and processing their requests.

Case Load

During the 2017–2018 fiscal year, HC processed 228 of 277 active requests (82%). Active requests included 237 new requests and 40 requests carried forward from 2016–2017.

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
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
2017–2018	237	40	277	228	8,608



Consultations Received from Other Government Institutions

In 2017–2018, HC completed a total of six consultations (114 pages) from other federal government departments. No consultations were received from institutions outside of the federal government.

NUMBER OF CONSULTATIONS AND PAGES REVIEWED FROM OTHER FEDERAL INSTITUTIONS

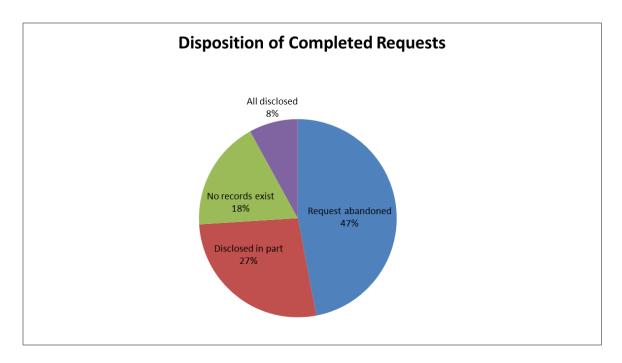
Federal Institutions	Number of Consultations Completed	Pages Reviewed
Public Health Agency of Canada	1	69
Royal Canadian Mounted Police	2	36
Veterans Affairs Canada	2	9
Canadian Border Services Agency	1	1
Total	6	114

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	8%
Disclosed in part	27%
No records exist	18%
Request abandoned	47%



A large percentage of Privacy Act requests made to HC are abandoned, mainly due to the requester's confusion surrounding the mandate of the Department and the information that it holds. Most of these "abandoned" requests concerned personal medical records that fall under provincial jurisdiction and are not held by HC. Requesters are advised of these details.

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 83% of the all exemptions invoked in 2017–2018.

PRINCIPAL EXEMPTIONS APPLIED

Exemptions	Number of Times Applied
Section 26 – Information about another individual	60
Section 27 – Solicitor-client privilege	7
Section 25 – Safety of individuals	4
Section 21 – International affairs and defence	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 2017–2018, HC did not exclude any information under either section 69 or 70.

VI. Completion Time

HC was able to respond within 30 days or less in 72% of the completed requests. Of the remaining requests, 13% were completed in 31 to 60 days, 8% in 61 to 120 days, and 7% in 121 days or more.

VII. Extensions

Legal extensions were invoked in 17 cases (8%) of the total 228 requests completed.

VIII. Translation

There were no requests for translation of records responsive to *Privacy Act* requests in 2017–2018.

IX. Format of Information Released

Of requests that were fully or partially disclosed, 36 were sent out in paper format and 46 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 \$1,781,552 responding to requests related to the *Act*. Of this total, salaries accounted for \$1,489,965 and administration costs accounted for \$292,587; most of the administration costs were used to retain temporary help to address the 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 91 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 delivered in 2017–2018, notably, a session on authorized communications and privacy impact assessments (PIAs) and a new session on privacy breaches designed to facilitate the management and prevention of such breaches. In total, 60 participants attended these additional training sessions. Furthermore, an online learning tool, which HC created, called Privacy Basics continued to be used in 2017–2018. The total of online learning participants in this course during the year was 472 from HC and 2411 from other departments. In all, 549 HC employees received *Privacy Act* training.

HC management continued to increase employee awareness on the protection of privacy and their responsibilities according to the *Privacy Act* by providing targeted information sessions: for example, promoting Privacy Awareness Week in October, during which, general awareness-raising communications and messages were sent out internally. Tweets on Privacy Awareness Week activities were shared approximately 8,000 times. The Privacy Management Division's Twitter feed had 245 followers by the end of the fiscal year.

RECENT PRIVACY INITIATIVES

In March 2018, the Privacy Management Division and the ATIP Division participated in an orientation session on integrating new HC employees. The session introduced employees to the main services they could need in the context of their work. Personnel from both divisions gave an overview of the meaning of privacy, why employees must manage it appropriately, the importance of detailed research while meeting reasonable deadlines and the inner workings involved when requests are processed. Thirty-six people participated in the session.

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

Privacy Management Division again gave an introductory course on the main requirements for collecting, using, retaining, communicating and withdrawing personal information and specific modules on monitoring the protection of privacy, managing privacy breaches and PIAs. The training was very popular with 2,411 government-wide participants completing it during 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 2017–2018, 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 2017–2018, HC participated in 2 in person meetings as well as one (1) conference call.

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

I. Complaints to the Privacy Commissioner

Twelve section 31, *Privacy Act* complaints were received on HC's processing of *Privacy Act* requests. OPC personnel sent nine section 33, *Privacy Act* notices to HC. Those notices provide HC authorities with the opportunity to make formal representations on active investigations. Last, five letters of finding (section 35) regarding complaints were received from the OPC.

II. Types of Complaints and their Disposition Completed

During 2017–2018, five investigations into complaints that related to the processing of *Privacy Act* requests were completed and closed by the OPC. All five findings were well-founded.

HC processed three informal complaints through the OPC early resolution process. Observations were shared with OPC personnel, the complaints were well-founded and the files were closed.

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 of Appeal during fiscal year 2017–2018.

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 2017–2018.

V. Privacy Audits

There were no privacy audits concluded during fiscal year 2017–2018 for HC.

MONITORING COMPLIANCE

The ATIP Division 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

During the 2017–2018 fiscal year, HC reported 32 privacy breaches affecting individuals. Most of these breaches concerned low-sensitivity information. None of the breaches were considered serious.

PRIVACY IMPACT ASSESSMENTS COMPLETED

Five privacy impact assessments were completed during the 2017–2018 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 send your request to: hc.privacy-vie.privee.sc@canada.ca

- 1. **ATIP Division's Ricoh case management system**: A PIA was launched on the subject of new case management systems to determine and mitigate risks to privacy in processing personal information for the purposes of access to information, *Privacy Act* requests and advice on the privacy policy for HC.
- 2. **Medical Marijuana Registration Program**: This PIA reviewed the risks to privacy associated with the processing of personal information in the [Medical Marijuana Registration Program], including the exchange of personal information with third parties. The PIA also dealt with the risks to privacy with the connected Jira software, which processes requests and information in certificates.
- 3. **Vision care benefit, NIHB**: This PIA was conducted to review the decision-making process for those applying for the vision care benefit under HC's Non-Insured Health Benefits (NIHB) Program.

- 4. **Special Access Program** (**SAP**): This PIA was conducted in the context of updating a 2009 PIA assessing the risks to privacy related to SAP operational activities containing the processing of personal information, specifically, SAP management of personal information related to the processing of special access requests (SARs) and the response for status update requests for processing SARs.
- 5. **Grants and Contribution Information Management System (GCIMS)**: This PIA was conducted to identify risks to privacy associated with the personal information used in the GCIMS, which will support the administration of HC grant and contribution programs and services.

DISCLOSURES MADE PURSUANT TO PARAGRAPH 8(2)(E)

There was one disclosure made pursuant to paragraph 8(2)(e) of the *Privacy Act*.

DISCLOSURES MADE PURSUANT TO PARAGRAPH 8(2)(M)

There were two communications in terms of paragraph 8(2)(m) of the *Privacy Act* and two written notices to the OPC in accordance with paragraph 8(5).

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: HEALTH CANADA - STATISTICAL REPORT

TBS/SCT 350-63

Name of institution: Health Canada

Reporting period: 2017-04-01 to 2018-03-31

Part 1: Requests Under the *Privacy Act*

	Number of Requests
Received during reporting period	237
Outstanding from previous reporting period	40
Total	277
Closed during reporting period	228
Carried over to next reporting period	49

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	2	5	7	4	0	1	0	20
Disclosed in part	4	19	14	13	4	4	4	62
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	24	11	2	2	0	1	0	40
Request abandoned	87	12	6	0	0	0	1	106
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	117	47	29	20	4	6	5	228

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)	0	22(1)(a)(ii)	0	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	0	24(a)	0
19(1)(c)	0	22(1)(b)	0	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	4
19(1)(e)	0	22(2)	0	26	60
19(1)(f)	0	22.1	0	27	7
20	0	22.2	0	28	0
21	1	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	10	10	0
Disclosed in part	26	36	0
Total	36	46	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	490	492	20
Disclosed in part	7,667	7,396	62
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	451	0	106
Neither confirmed nor denied	0	0	0
Total	8,608	7,888	188

2.5.2 Relevant pages processed and disclosed by size of requests

	Less Tha Pages Pro		Pag	-500 ges essed	Pa	1,000 ges essed	Pa	-5,000 ges essed	5,0 Pa	Than 000 ges essed
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	18	231	2	261	0	0	0	0	0	0
Disclosed in part	39	1,708	21	4,448	2	1,240	0	0	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	105	0	1	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	162	1,939	24	4,709	2	1,240	0	0	0	0

2.5.3 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	3	0	0	2	5
Disclosed in part	6	1	0	3	10
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	9	1	0	5	15

2.6 Deemed refusals

2.6.1 Reasons for not meeting statutory deadline

Number of Requests Closed Past	Principal Reason					
the Statutory Deadline	Workload	External Consultation	Internal Consultation	Other		
57	40	2	2	13		

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	16	3	19
16 to 30 days	7	0	7
31 to 60 days	10	1	11
61 to 120 days	6	3	9
121 to 180 days	0	1	1
181 to 365 days	4	2	6
More than 365 days	2	2	4
Total	45	12	57

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
1	2	2	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	1	0
Disclosed in part	4	0	9	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	1	0	0	0
Request abandoned	2	0	0	0
Total	7	0	10	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	7	0	10	0
Total	7	0	10	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	6	114	1	4
Outstanding from the previous reporting period	1	5	0	0
Total	7	119	1	4
Closed during the reporting period	6	115	1	4
Pending at the end of the reporting period	1	4	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							
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	3	1	1	1	0	0	0	6
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	3	1	1	1	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 days	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	1	0	0	0	0	0	0	1
Total	1	0	0	0	0	0	0	1

Part 7: Completion Time of Consultations on Cabinet Confidences

7.1 Requests with Legal Services

	Fewer Ti Pages Pro		101-500 Pages Processed		501-1,000 Pages Processed		1,001-5,000 Pages Processed		More than 5,000 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

7.2 Requests with Privy Council Office

	Fewer Than 100 Pages Processed			501-1,000 Pages Processed Processed		Pa	-5,000 ges essed	5,0 Pag	than 000 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

Part 8: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
12	9	5	0	26

Part 9: Privacy Impact Assessments (PIAs)

Number of PIA(s) completed	4
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Part 10: Resources Related to the *Privacy Act*

10.1 Costs

Expenditures	Amount	
Salaries	\$1,478,692	
Overtime	\$10,273	
Goods and Services		\$292,587
Professional services contracts	\$233 630	
• Other	\$58 957	
Total		\$1,781,552

10.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	16.04
Part-time and casual employees	0.79
Regional staff	0.00
Consultants and agency personnel	1.40
Students	0.00
Total	18.23

APPENDIX C: HEALTH CANADA ON BEHALF OF INDIGENOUS SERVICES CANADA - STATISTICAL REPORT

TBS/SCT 350-63

Name of institution: Health Canada on behalf of Indigenous Services Canada

Reporting period: 2017-04-01 to 2018-03-31

Part 1: Requests Under the *Privacy Act*

	Number of Requests
Received during reporting period	6
Outstanding from previous reporting period	0
Total	6
Closed during reporting period	6
Carried over to next reporting period	0

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	0	0	1	0	0	0	0	1		
Disclosed in part	0	1	0	0	0	0	0	1		
All exempted	0	0	0	0	0	0	0	0		
All excluded	0	0	0	0	0	0	0	0		
No records exist	2	1	1	0	0	0	0	4		
Request abandoned	0	0	0	0	0	0	0	0		
Neither confirmed nor denied	0	0	0	0	0	0	0	0		
Total	2	2	2	0	0	0	0	6		

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)	0	22(1)(a)(ii)	0	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	0	24(a)	0
19(1)(c)	0	22(1)(b)	0	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	0
19(1)(f)	0	22.1	0	27	0
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	0	1	0
Disclosed in part	1	0	0
Total	1	1	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	18	18	1
Disclosed in part	149	145	1
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	0	0	0
Neither confirmed nor denied	0	0	0
Total	167	163	2

2.5.2 Relevant pages processed and disclosed by size of requests

	Less Than Pages Proce		101-500 Pages Processed		501-1,000 Pages Processed		1,001-5,000 Pages Processed		More Than 5,000 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	1	18	0	0	0	0	0	0	0	0
Disclosed in part	0	0	1	145	0	0	0	0	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	0	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	1	18	1	145	0	0	0	0	0	0

2.5.3 Other complexities

Disposition	Consultation Required	Legal Advice Interwoven Sought Information O		Other	Total
All disclosed	0	0	0	0	0
Disclosed in part	0	0	0	0	0
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	0	0	0	0	0

2.6 Deemed refusals

2.6.1 Reasons for not meeting statutory deadline

Number of Paguages Classed Bast	Principal Reason						
Number of Requests Closed Past the Statutory Deadline	Workload	External Consultation	Internal Consultation	Other			
0	0	0	0	0			

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	0	0	0
16 to 30 days	0	0	0
31 to 60 days	0	0	0
61 to 120 days	0	0	0
121 to 180 days	0	0	0
181 to 365 days	0	0	0
More than 365 days	0	0	0
Total	0	0	0

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
0	0	0	0

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	0	0	0	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	1	0	0	0
Request abandoned	0	0	0	0
Total	1	0	0	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	1	0	0	0
Total	1	0	0	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	0	0	0	0
Outstanding from the previous reporting period	0	0	0	0
Total	0	0	0	0
Closed during the reporting period	0	0	0	0
Pending at the end of the reporting period	0	0	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							
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	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

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 Processo	_	101-500 Pages Processed		501-1,000 Pages Processed		1,001-5,000 Pages Processed		More than 5,000 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

7.2 Requests with Privy Council Office

	Fewer Than 10 Process		ages 101–500 Pages Processed		501-1,000 Pages Processed		1,001-5,000 Pages Processed		More than 5,000 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
0	0	0	0	0

Part 9: Privacy Impact Assessments (PIAs)

Number of PIA(s) completed	0
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Part 10: Resources Related to the *Privacy Act*

10.1 Costs

Expenditures	Amount	
Salaries	\$0	
Overtime		\$0
Goods and Services		\$0
Professional services contracts	\$0	
Other	\$0	
Total		\$0

10.2 Human Resources

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