



Veterans Affairs
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ANNUAL REPORT

Administration of the
Privacy Act

2018-2019

The Honourable Lawrence MacAulay
Minister of Veterans Affairs and Associate Minister of National Defence

Table of Contents

Table of Contents.....	1
1. Introduction.....	2
Mandate of Veterans Affairs Canada.....	2
2. Organization.....	3
3. Delegation Order.....	4
4. Highlights of the 2018-19 Statistical Report.....	4
I Requests under the <i>Privacy Act</i>	4
II Disposition of Requests Completed.....	5
III Completion Time.....	6
IV Exemptions Cited.....	7
V Exclusions Cited.....	8
VI Translation.....	8
VII Corrections and Notations.....	9
VIII Extensions.....	9
IX Consultations.....	9
X Costs.....	9
5. Training and Awareness.....	10
6. Policies, Guidelines, Procedures and Initiatives.....	12
7. Summary of Key Issues and Actions Taken on Complaints or Audits.....	13
8. Monitoring Compliance.....	14
9. Material Privacy Breaches.....	15
10. Privacy Impact Assessments.....	15
11. Public Interest Disclosures.....	17
Annex 1: Delegation Order – <i>Privacy Act</i> and Privacy Regulations.....	18
Annex 2: Statistical Report on the <i>Privacy Act</i>	22
Annex 3: Five-Year Statistical Analysis.....	30
Annex 4: Definitions of Dispositions.....	31
Annex 5: Office of the Veterans Ombudsman Annual Report on the Administration of the <i>Privacy Act</i>	32

1. Introduction

Privacy is a fundamental right in Canada. The *Privacy Act* operates to protect Canadians with respect to their personal information held by the Government of Canada. The *Act* provides Canadians citizens and permanent residents with the general right to access, and seek correction of their personal information that is held by the federal government. The *Act* also provides the framework for the collection, accuracy, use, disclosure, retention and disposition of personal information. Personal information may only be used for the purposes allowed by the *Privacy Act*, and may only be disclosed in accordance with the legislation. This *Act* complements other departmental legislation and procedures for the collection, use and disclosure of personal information.

This annual report on the administration of the *Privacy Act* outlines how VAC fulfilled its responsibilities under the *Privacy Act* during the fiscal year April 1, 2018 to March 31, 2019. This report is prepared and tabled in Parliament in accordance with section 72 of the *Privacy Act*.

Under the [Privacy Act](#), “personal information” is defined as “information about an identifiable individual that is recorded in any form.” Examples include information about national or ethnic origin, colour, religion, age or marital status of an individual; education or medical, criminal, financial or employment history of an individual; address, fingerprints or blood type of an individual; and, any identifying number, symbol or other particular identifier assigned to an individual.

Mandate of Veterans Affairs Canada

Veterans Affairs Canada (VAC) takes the responsibility to protect the privacy of Veterans and their families very seriously. VAC recognizes that a successful transition from service to civilian life is best achieved when the overall well-being of Veterans is positive and reflects a balance of financial, mental, physical and social factors. VAC strives to be proactive, timely and compassionate in its response to Veterans and their families through the provision of benefits and services designed to meet their unique needs.

VAC’s mandate is set out in the [Department of Veterans Affairs Act](#), which gives the Minister of Veterans Affairs responsibility for:

“...the care, treatment or re-establishment in civil life of any person who served in the Canadian Forces or Merchant Navy or in the naval, army, air forces or merchant navies of Her Majesty, of any person who has otherwise engaged in pursuits relating to war, and of any other person designated . . . and the care of the dependents or survivors of any person referred to...”

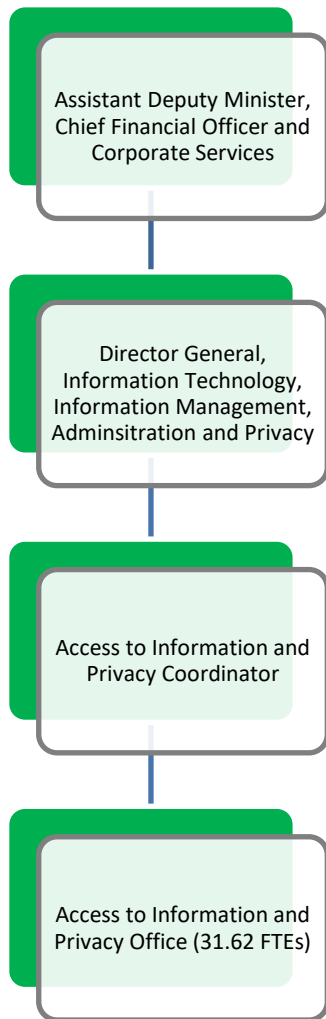
VAC is also responsible for keeping alive the achievements and sacrifices of those who served Canada in times of war, military conflict and peace. VAC fulfills this mandate by supporting the

care and well-being of Veterans and their families through a range of benefits, services, research, partnerships, and by commemorating those who served in Canada’s military efforts.

2. Organization

The VAC Access to Information and Privacy (ATIP) Coordinator acts on behalf of the Minister and Deputy Minister of Veterans Affairs to ensure that the Department fulfills its responsibilities under the *Access to Information Act* and the *Privacy Act*.

Processing of access to information and privacy requests is centralized within the ATIP Office in Charlottetown, Prince Edward Island. The ATIP Office is comprised of two teams: Operations, and Policy and Governance. In 2018-2019, the VAC ATIP Office employed a total of 31.62 full-time equivalents (FTEs).



The main activities at the VAC ATIP Office include:

- Processing**
 - Requests for information submitted under the *Access to Information Act* and the *Privacy Act*, including consulting with other federal departments and third parties with respect to requests received
- Developing**
 - Policies, procedures and guidelines in support of Access to Information and Privacy legislation, and central agency requirements
 - Appropriate Privacy Notice Statements
 - Privacy Impact Assessments (PIA)
- Monitoring**
 - Legislative and regulatory changes that impact ATIP
 - Compliance with both acts, regulations and central agency requirements
 - Trends in Access to Information requests and analyzing opportunities to proactively release VAC information through Open Government
- Evaluating**
 - New and amended forms and processes that impact the collection of personal information
 - Contracts and Memoranda of Understanding
- Informing**
 - VAC employees of their roles and responsibilities in awareness and training sessions on ATIP
 - VAC employees of ATIP issues by providing advice and guidance
 - Canadians through preparing annual reports to Parliament on the administration of the Acts
- Managing**
 - Privacy breaches
 - Complaints against VAC which have been submitted to the Information Commissioner of Canada and to the Privacy Commissioner of Canada

3. Delegation Order

The responsibilities associated with the administration of the *Privacy Act* are delegated to VAC officials through a delegation order (attached as Annex 1).

4. Highlights of the 2018-19 Statistical Report

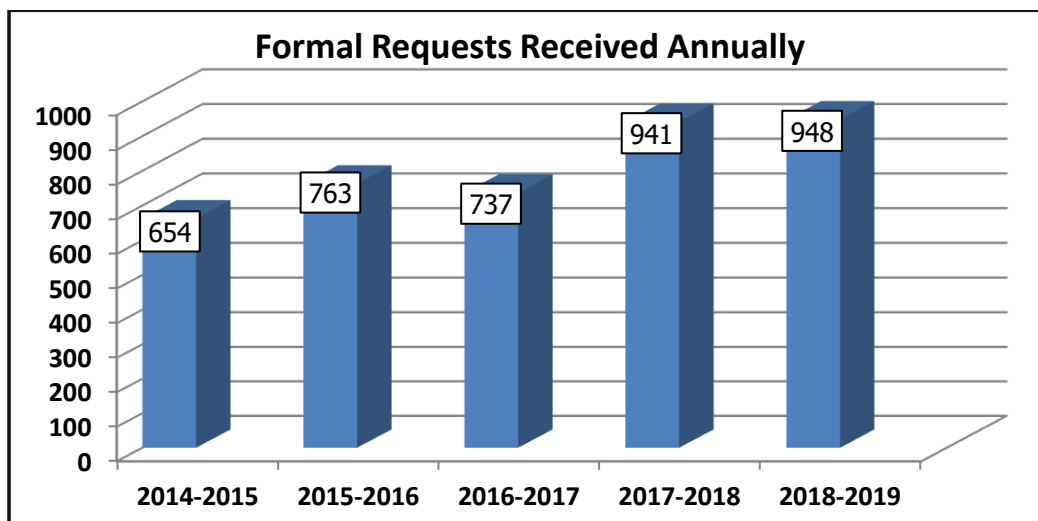
The following summary provides an overview of key statistics on the administration of the *Privacy Act* at VAC between April 1, 2018, and March 31, 2019. A more detailed breakdown can be found in the 2018-2019 Statistical report (attached as Annex 2).

I Requests under the *Privacy Act*

Between April 1, 2018 and March 31, 2019, the Department received 948 formal requests for information under the *Privacy Act*. This represents a slight increase from 2017-2018 when VAC which received 941 requests. As in 2017-2018, the trend toward more complex privacy requests continued in 2018-2019. The VAC ATIP Office also experienced a 25% increase in requests for personal information received under the *Access to Information Act* (184 Access Privacy requests received in 2018-2019 compared to 147 received in 2017-2018).

On April 1, 2018, VAC carried forward 93 open formal requests from the previous year. Combined with the 948 requests received in 2018-2019, a total of 1,041 requests were active during the 2018-2019 fiscal year. The Department completed 922 formal requests during the reporting period, compared with 947 formal requests completed in the previous year.

A **formal request** is a written request made under the *Privacy Act* to the government institution that controls the record. The Department has 30 calendar days to respond. There are limited situations where extensions are permitted. If an extension is required, requestors are notified in writing. There is no fee to make a privacy request.



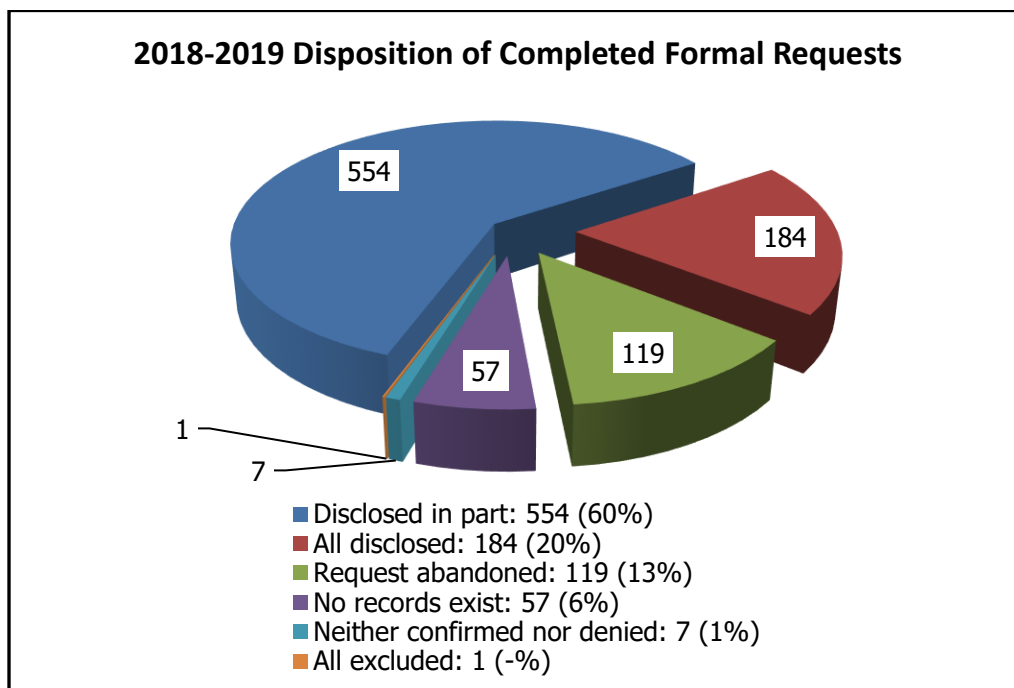
While the Department addresses the majority of requests formally, it also processes some requests for personal information informally. For example, if an individual requests military service information for a family member who has been deceased more than 20 years, the VAC ATIP Office would treat that request informally by transferring the request to Library and Archives Canada who hold those records. In 2018-2019, VAC processed 12 informal requests compared to 14 in 2017-2018.

An **informal request** is a request for information that is not made or processed under the *Act* (e.g., the request is not submitted formally via the online portal or on a Personal Information Request Form, or neither piece of legislation has been noted in the request).

At the end of the 2018-2019 fiscal year, VAC carried forward 119 outstanding formal requests into the 2019-2020 fiscal year.

II Disposition of Requests Completed

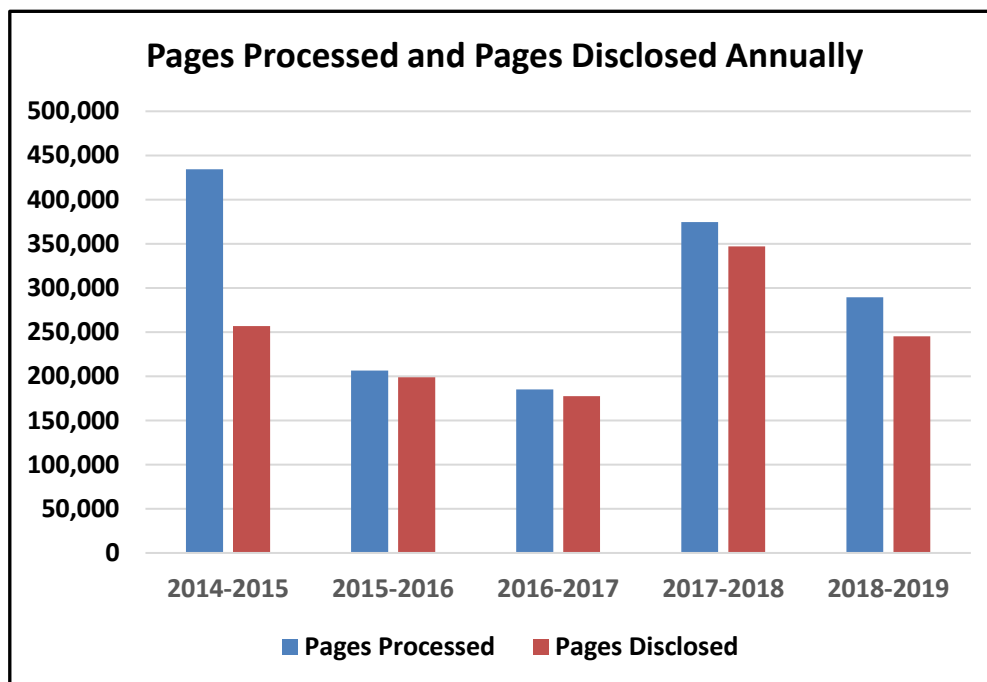
In the majority (60%) of the formal requests completed in 2018-2019, information was disclosed in part to the requester. In a further 20% of cases, information was disclosed in full (see Section IV for further information on Exemptions). The following chart provides details on the disposition of the 922 requests completed in 2018-2019:



During the reporting period, VAC processed 289,348 pages and disclosed 245,377 pages under the *Privacy Act*. This represents a 23% decrease in pages processed and a 29% decrease in

pages disclosed, compared to the 2017–2018 fiscal year when 374,292 pages were processed and 346,931 pages disclosed.

An additional 70,450 pages were processed and 65,475 pages disclosed in response to 181 requests for personal information under the *Access to Information Act* completed in 2018-2019.



III Completion Time

Ensuring that Canadians receive timely access to information is key. VAC is committed to continue to improve completion times of privacy requests through various measures, including frequent reporting to monitor performance; an escalation process to ensure retrievals are received on a timely basis; weekly meetings to establish priorities and reallocate resources as necessary; and working closely with program areas throughout the Department on completing timely and quality retrievals.

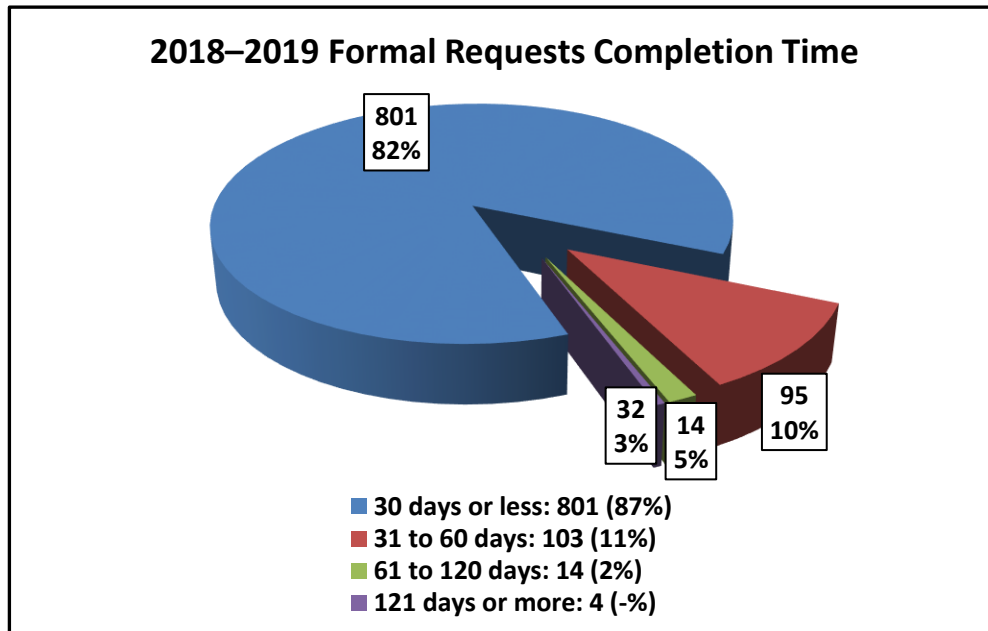
The results of VAC’s commitment is obvious. Of the 922 formal requests completed in 2018-2019, 93% or 857 requests were completed on-time. This is an improvement from 2017-2018 when 84% (or 798) of formal requests were completed on-time, and reflects a positive trend in improved completion rates since 2016-2017.

Requests completed **on-time** are completed within 30-days or within the legislated extension time.

As illustrated in the following chart, 87% or 801 of the 922 formal requests were completed in 30 days or less. An additional 13% or 121 requests required more

than 30-days to complete due to the complex nature of the requests, high volume of documents involved, and consultations required. In comparison, 82% (778) of requests were completed within the 30-day legislated time frame in 2017-2018, with an additional 169 requests (18%) requiring additional time and effort to complete. This increase reflects improved information management practices, application of reasonable extensions for more complex and/or high volume cases so requesters can better anticipate when they will receive the information which they are seeking, and collaboration between both program areas and the VAC ATIP Office to complete cases in a timely fashion. The significant improvement in processing times has also been achieved in an environment where requests continue to increase in both complexity and volume.

During the 2018-2019 reporting period, significant progress was made in reducing the number of requests taking longer to process. Only 18 requests took more than 60 days to process in 2018-2019, compared to 74 requests in 2017-2018.



IV Exemptions Cited

Canadians have a right of access to their personal information. The *Privacy Act*, however, identifies specific exemptions for which the need for confidentiality of certain information is recognized. VAC invoked 572 exemptions under sections 22, 25, 26, 27 and 28 of the *Privacy Act*. The most frequently applied exemption was section 26, which allows for information to be withheld that relates to any individual other than the individual (e.g., family member) who made the request. This exemption ensures that the personal information of

An **exemption** is a provision under the *Act* that authorizes the non-disclosure of certain personal information in response to a privacy request.

anyone, other than the requester, is protected. VAC invoked 560 exemptions under section 26 in 2017-2018, compared to 540 in 2017-2018. The increased use of section 26 in recent years reflects the continued engagement of families in the rehabilitation, treatment and the well-being of Veterans.

The following table identifies the number of requests where specific types of exemptions were applied by VAC. Note: For statistical purposes, an exemption is counted only once when it is applied to a file multiple times.

Exemptions cited	2016-2017	2017-2018	2018-2019
Section 21 (International affairs and defence)	1	1	0
Paragraph 22(1)(a)(i) (Law enforcement and investigation)	1	2	1
Paragraph 22(1)(a)(ii) (Law enforcement and investigation)	1	1	0
Paragraph 22(1)(b) (Law enforcement and investigation)	1	1	2
Section 22.4 (National Security and Intelligence Committee)	-	-	0
Section 25 (Safety of individuals)	0	0	1
Section 26 (Information about another individual)	398	540	560
Section 27 (Solicitor-client privilege)	3	3	4
Section 27.1 (Patent or Trademark privilege)	-	-	0
Section 28 (Medical record)	4	9	4
Total exemptions cited	409	557	572

V Exclusions Cited

Sections 69 and 70 of the *Privacy Act* set out exclusions. Examples of exclusions include published material, material available for purchase by the public, material placed in the Library and Archives of Canada or confidences of the Queen’s Privy Council for Canada. During this reporting period, no exclusions were applied by VAC under section 70. In comparison, two exclusions were applied under section 70 in 2017-2018.

An **exclusion** is information to which the *Act* does not apply.

VI Translation

In 2018-2019, VAC received and accepted four requests to translate documents included in privacy retrievals from French to English, at a cost of \$37,710. This is a change from recent years when no requests for translation were received.

VII Corrections and Notations

Under the *Privacy Act*, individuals are entitled to request correction and notation of personal information when they believe there is an error or omission. Similar to 2017-2018, no requests for corrections and notations were received by VAC in 2018-2019.

VIII Extensions

Section 15 of the *Privacy Act* provides for the extension of the statutory time limits if: (1) meeting the original time limit would unreasonably interfere with the Department's operations; or (2) consultations are necessary.

In 2018-2019, a total of 28 requests were extended by VAC. These extensions were due to the volume of documents to be processed, consultation with other institutions, and translation. All 28 extensions were between 16 to 30 days in length. The use of extensions has increased in recent years and reflects the rising complexity of requests and volume of information retrieved in response to privacy requests.

IX Consultations

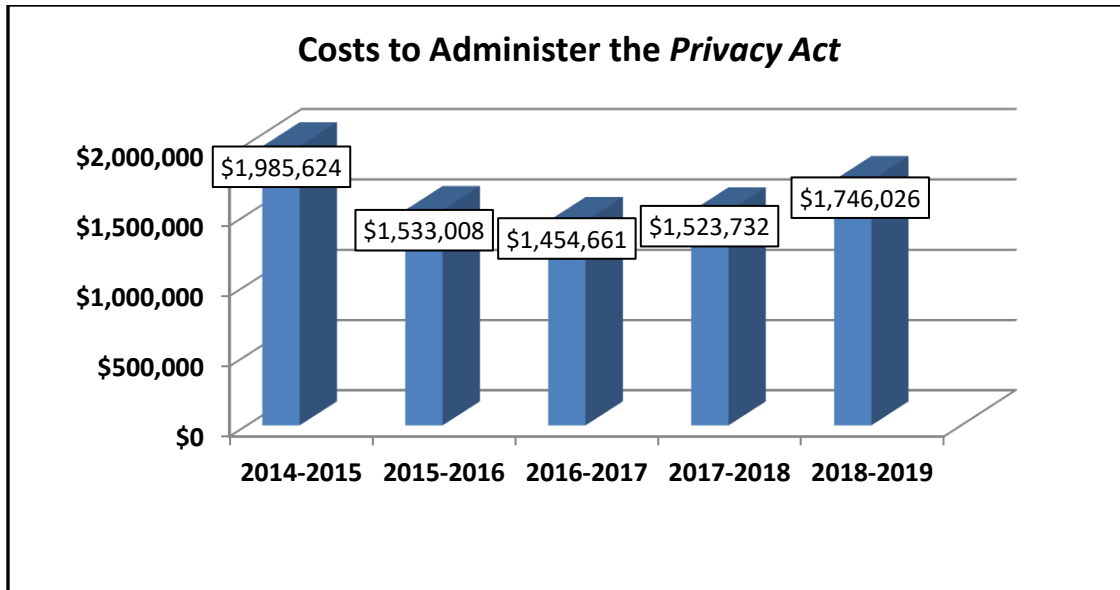
Similar to 2017-2018, VAC did not receive any requests for consultation on VAC information from other government institutions or organizations during the 2018-2019 fiscal year. No consultations were carried forward into the 2019–2020 fiscal year.

The continued decline in requests for consultation on VAC information is attributed to agreements in place between VAC and partner departments, such as the Department of National Defence, about what information requires consultation and what can be done within the VAC ATIP Office.

X Costs

To effectively manage workload, a number of employees in the VAC ATIP Office are involved in both the administration of the *Access to Information Act* and the *Privacy Act*. Total FTEs in 2018-2019 were 31.62, compared to 28.43 FTEs in 2017-2018. Of the 31.62 FTEs, 23.13 FTEs were dedicated primarily to the administration of the *Privacy Act* in 2018-2019.

The VAC ATIP office spent a total of \$1,746,026 to administer the *Privacy Act* during the reporting period, of which \$1,674,554 was spent on salaries and \$71,472 for other administrative costs. No overtime costs were incurred in 2018-2019. An increase in FTEs, as well as additional translation and operating expenditures, accounts for the increase in costs in 2018-2019 compared to the previous year.



5. Training and Awareness

VAC takes its responsibility to protect the privacy of Veterans, their families and employees very seriously. Everyone involved in handling personal information has a responsibility to keep it secure and confidential, which is why a continued emphasis was placed on ATIP awareness training for departmental staff during 2018-2019. Twenty-four sessions providing customized ATIP awareness training were offered to 538 VAC employees and contracted staff during the year. Guidance on effective information management and GCdocs in support of timely and comprehensive privacy retrievals was provided to 437 employees in 64 sessions. As well, beginning in June 2018, Integrated Security/ATIP training moved to the Canada School of Public Service (CSPS) online platform, which enabled 1,346 employees to complete this training in 2018-2019.

The following describes the training activities related to privacy with respective participants and sessions for each:

Integrated Security / ATIP Training

1,346 employees completed online training in 2018-19

- This online course provides foundational knowledge about security awareness, including the protection of personal and institutional information; how to appropriately safeguard documents; and, the need to know.

ATIP Awareness Sessions

538 Participants in 24 Sessions (20 English sessions and 4 French sessions)

ATIP Awareness sessions focus on ATIP principles and best practices. The sessions are customized in order to provide a general overview of the *Access to Information Act* and the *Privacy Act*; the duty to assist; exemptions and exclusions; breach mitigation; how to document information in electronic client repositories to appropriately safeguard it; and, the roles and responsibilities related to privacy management. In addition, sessions are customized to focus on certain ATIP areas depending on the audience. In 2018-19, sessions were delivered to new employees, including adjudicators and nurses, as well as contractors. Refresher sessions were also delivered to various program areas.

Effective Information Management 50 Participants in 3 Sessions

Effective Information Management sessions included training on how to manage information, and the value of good information management, including access to personal information for privacy retrievals.

GCdocs 387 Participants in 61 Sessions

GCdocs training provides VAC staff with the necessary skills and techniques to effectively store, organize, classify, share, retrieve and dispose of electronic information in electronic corporate and client repositories.

Right to Know Week, September 24-30, 2018

VAC launched an awareness campaign in September 2018 to mark *Right to Know Week* in Canada. An article on the departmental internal website provided information on *Right to Know Week* and related events. The article also reminded VAC employees of their responsibilities when responding to a retrieval made under the *Access to Information Act* or *Privacy Act*; promoted the “Need-to-Know” principle when employees are accessing the departmental corporate repository GCdocs; and provided links to online departmental resources including frequently asked questions and ATIP desktop references.

Data Privacy Day – January 28, 2019

The VAC Privacy Policy Unit posted an article on the departmental internal website to mark Data Privacy Day 2019. The article reminded VAC employees of the importance of data privacy and provided tips for employees to protect their privacy and stay safe online.

Privacy Awareness Lockscreen – March 2019

In March 2019, a desktop lockscreen infographic was developed to remind VAC employees to be privacy aware when sharing information in public spaces. The lockscreen ran for an initial two-week period, and will be re-run periodically in future months to reinforce the message of

privacy awareness in public spaces.

6. Policies, Guidelines, Procedures and Initiatives

The VAC ATIP Office continues to work with program areas and other Departments to ensure privacy principles are adhered to in relation to any information sharing required to support the delivery of Departmental programs and services. Increased emphasis was placed on privacy by design in 2018-2019 to help mitigate the risk of a privacy breach, build trust and confidence, and help to identify problems earlier in initiatives, to ensure that risks are eliminated or appropriately mitigated through the design process.

During the 2018-2019 reporting period, privacy impact assessments were completed for the new Pension for Life programs launched on April 1, 2019. To ensure the privacy risks identified in these and other assessments are mitigated, the VAC ATIP Office implemented a new monitoring and tracking process in 2018-2019. Under this new process, the VAC ATIP Office conducts quarterly follow ups with programs to ensure outstanding privacy risks are addressed.

The VAC ATIP Office also provided privacy expertise in support of the Closing the Seam (Budget 2019) initiatives, and preparations for commemorative events to mark the 75th anniversary D-Day in June 2019.

As part of ongoing maintenance, VAC monitored current privacy policies, guidelines, and procedures during the 2018-2019 reporting period. VAC also developed several business process documents to assist with the timeliness and completeness of privacy retrievals. These documents are available to all VAC employees on the departmental Intranet and include:

- Functional Direction on Digital Imaging of Paper Information Resources of Business Value
 - This directive provides guidance to employees on how to preserve paper documents of business value in an electronic format, which can be saved in a corporate repository and easily retrieved when subject to an access to information or privacy request.
- Escalation Process
 - This is an internal process to provide guidance to VAC ATIP Officers on how to escalate retrievals when program areas are not meeting deadlines to provide information required to process an access to information or privacy request.
- Privacy Risk Assessment Desktop Reference
 - This desktop reference assists employees in better assessing the risk of injury or harm to individuals should an event impacting the privacy of an individual's personal information occur.

- Privacy, Information Management and Information Technology Security Needs Determination Report Template
 - This report template assists employees in providing a comprehensive summary of a project or activity so that privacy, information management and information technology security needs can be appropriately addressed.

7. Summary of Key Issues and Actions Taken on Complaints or Audits

I Complaints

In 2018-2019, VAC received five complaints in relation to privacy requests. Of the five complaints received, two were related to use and disclosure of personal information; one was related to collection; one was related to time limits; and, one was related to denial of access.

VAC carried over three complaints from 2017-2018, for a total of 8 complaints requiring action in the 2018-2019 fiscal year. VAC made representation to the Office of the Privacy Commissioner on 7 of the 8 complaints; all 7 were pursuant to section 33. Five of the 8 complaints received a ruling from the Office of the Privacy Commissioner of Canada during the reporting period. One was deemed well founded; 3 were deemed not well founded; and one was discontinued. The remaining three complaints were carried forward to 2019-2020. VAC takes any findings from the Office of the Privacy Commissioner of Canada seriously and acts on the recommendations.

There were no appeals to the courts for VAC during the 2018-2019 reporting period.

II Audits

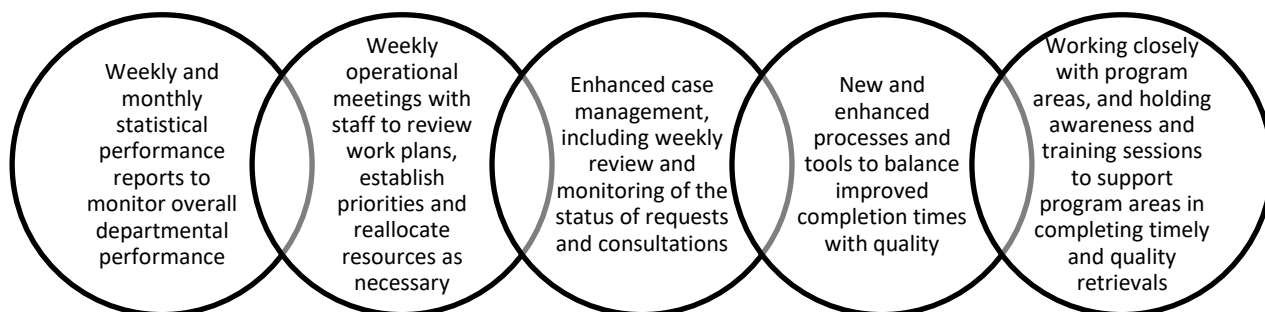
No audits were completed during the 2018-2019 fiscal year. The VAC ATIP Office has addressed all recommendations arising from the March 2018 *Audit of Access to Information and Privacy Requests Processing* conducted by the VAC Audit and Evaluation Division. The audit recognized that VAC has made significant improvements related to the completion of requests within the legislated 30-day timeframe. In response to audit recommendations, the VAC ATIP Office offers customized ATIP awareness training, as well as general training and tools, to employees and contract staff, and continues to improve data analysis in support of improved performance.

The ***Audit of Access to Information and Privacy Requests Processing March 2018*** can be viewed at veterans.gc.ca.

8. Monitoring Compliance

Monitoring

Using a robust case monitoring system, the VAC ATIP Office reviews the status of requests to monitor deadlines, allocate resources, escalate outstanding retrievals, and report on the status of active requests to ATIP Liaison Officers and Directorate, Divisional and senior management. More specifically, monitoring involves:



The VAC ATIP Office continued to enhance and monitor reporting on privacy retrieval times in 2018-2019, to ensure retrievals were received on a timely basis. Additionally, the Office continued to monitor and adjust privacy processes to improve service during 2018-2019. These efforts contributed to a 93% on-time completion rate for formal privacy requests in 2018-2019.

The VAC ATIP Office continues to develop internal guidance documents, business processes, and enhanced training and awareness, to balance ease of access and administrative burden with protection of personal information. In 2019-20, there will be an enhanced focus on awareness training for IT and security specialists about appropriately handling and safeguarding personal information.

Requests for Correction

Similar to 2017-2018, VAC did not receive any requests for correction of personal information in 2018-2019. The VAC ATIP Office has a process in place to respond to these requests when they do occur, and works closely with the program area responsible to ensure corrections are made in a timely manner.

9. Material Privacy Breaches

VAC takes the protection of personal information very seriously, and stresses the importance of ongoing awareness, training, advice and guidance on what constitutes a privacy breach and how to prevent breaches from occurring. This work complements the internal policies and procedures in place about breach management.

During the 2018-2019 fiscal year, 69 breaches impacting 112 individuals were confirmed by VAC. This is similar to 2017-2018, when 68 breaches were reported, however the number of individuals impacted in 2018-2019 decreased by 58% (269 individuals were impacted in 2017-2018).

Of the 69 breaches reported in 2018-2019, there were no material breaches. In comparison, there were two material breaches in 2017-2018 which impacted 186 individuals.

VAC treats every breach as a serious matter, and requires employees to report privacy incidents as soon as possible. In accordance with the Treasury Board Secretariat *Directive on Privacy Practices* and the *Guidelines for Privacy Breaches*, VAC reports only material breaches to the Office of the Privacy Commissioner and the Treasury Board Secretariat. VAC's practice is consistent with other government institutions and Treasury Board Secretariat guidance.

A **material privacy breach** involves sensitive personal information that could reasonably be expected to cause serious injury or harm to the individual and/or involves a large number of affected individuals.

10. Privacy Impact Assessments

In accordance with the Treasury Board Secretariat's [Directive on Privacy Impact Assessment](#), the Department conducts Privacy Impact Assessments (PIAs) on new programs, systems or policies, or when substantial modifications are made to an existing program, system or policy, and when services are contracted to another party. Initiatives are assessed and, when possible privacy concerns are identified, a mitigation strategy is developed to eliminate or lower the risk.

During the 2018–2019 fiscal year, VAC submitted two new PIAs to the Office of the Privacy Commissioner (OPC) and Treasury Board Secretariat (TBS) and two addendums. In addition, 19 PIA Needs Determinations were completed to determine if new or amended programs or projects required a full PIA.

The purpose of a [Privacy Impact Assessment](#) (PIA) is to ensure that privacy implications or risks are appropriately identified, assessed and resolved before a new or substantially modified program or activity involving personal information is implemented.

The following programs and activities were assessed during the fiscal year:

Disability Benefits

Traditionally, “Disability Benefits” refers to Disability Pensions provided under the *Pension Act*, along with Disability Awards and Death Benefits granted under *Veterans Well-being Act*. For the purposes of the Disability PIA, it includes the new non-economic benefits added to the VWA, VWA non-economic benefits (i.e. Death Benefit, Clothing Allowance, and Detention Benefit), and Pension Act benefits (i.e. Disability Pension, Clothing Allowance, Attendance Allowance, Exceptional Incapacity Allowance, and Prisoner of War Compensation). Through VAC’s Pension for Life initiative and the VWA, Canadian Armed Forces members and Veterans who have a service-related injury and/or illness are provided with a monthly payment for life option; that is the Pain and Suffering Compensation (PSC). Those experiencing barriers to re-establishment in post-service life due to a service-related permanent and severe impairment will be provided with additional recognition and compensation through the Additional Pain and Suffering Compensation (APSC).

Income Replacement Benefit

Through VAC’s Pension for Life Initiative, the Income Replacement Benefit program provides economic support to eligible Canadian Armed Forces Veterans, members’ or Veterans’ surviving spouse/common-law partner, or orphans for the economic impact that a career ending and/or service-related injury or death can have on a Veteran’s ability to earn income, advance in a career or save for retirement. Support is provided to Veterans who have health problems resulting from service that are causing a barrier to re-establishment, and who are participating in the Rehabilitation Program; and those who were eligible for the program, but are unable to participate due to a diminished earnings capacity. Compensation is provided in the form of monthly income support payments. A lump sum benefit may be paid to the surviving spouse/common-law partner or orphans for non-service related death before the Veteran’s age of 65, if the Veteran was entitled to the Income Replacement Benefit at the time of his/her death. This lump sum payment equates to 24 times the amount of the Income Replacement Benefit amount that the Veteran would have been entitled to, for the month in which s/he died, before offsets.

Addendum – International Commemorative Activities

VAC has a mandate to pay tribute to the contribution and sacrifice of all who have served, and continue to serve, our country in times of war, conflict and peace. An integral part of the Government of Canada’s commemoration effort relates to overseas events and ceremonies. VAC works closely with the voluntary sector, quasi-government and international organizations, including foreign, regional and local government institutions to organize and deliver overseas commemorative events and ceremonies. The International Commemorative Activities Addendum assesses the privacy risks in an ever changing security environment and requirements that VAC is required to comply with to ensure the successful planning and delivery of overseas commemorative events.

Addendum – Rehabilitation Services and Vocational Assistance

The Veterans Affairs Canada (VAC) Rehabilitation Services and Vocational Assistance Program (Rehabilitation Program) is one of a suite of wellness programs designed to help modern-day Veterans and their families make and maintain the transition to civilian life. The Program offers comprehensive services, as part of an individualized rehabilitation plan, that can help restore their ability to function at home, and in their community and workplace. Eligible clients include Canadian Armed Forces (CAF) Veterans and, in certain cases, their spouses, common-law partners or survivors.

After the completion of the 2007 PIA for Rehabilitation Services, the delivery approach was changed. While the decisions regarding eligibility are always made by VAC, some assessments and the delivery of vocational rehabilitation services are delivered, in part, by an external service provider under contract with VAC. Eligibility for the Rehabilitation Program was changed beginning on April 1, 2019. As a result, an Addendum was completed to assess the privacy impacts of program eligibility.

11. Public Interest Disclosures

Subsection 8(2) of the *Privacy Act* provides limited and specific circumstances under which institutions may disclose personal information without an individual's consent. Paragraph 8(2)(m) allows institutions to release personal information if either the public interest in disclosure clearly outweighs any invasion of privacy that could result from disclosure, or if the disclosure would clearly benefit the individual to whom the information relates.

VAC had no disclosures of personal information pursuant to paragraph 8(2)(m), during the 2018-2019 reporting period.

Annex 1: Delegation Order – *Privacy Act* and Privacy Regulations

Delegation Order - *Privacy Act* and *Privacy Regulations*

The Minister of Veterans Affairs, pursuant to section 73 of the *Privacy Act*, hereby designates the persons holding the positions set out in the schedule hereto, or the persons occupying on an acting basis those positions, to exercise the powers, duties and functions of the Minister as the head of Veterans Affairs Canada, under the provisions of the Act and related regulations set out in the schedule below. This designation replaces all previous delegation orders.

Privacy Act Provisions and associated descriptions		Column 1 Deputy Minister and Associate DM	Column 2 All Assistant Deputy Ministers, the Director General of Communications and senior management positions within the Department of Veterans Affairs Canada that reports directly to the positions outlined in Column 1	Column 3 Privacy Coordinator within the Department of Veterans Affairs Canada	Column 4 Any senior analyst position (PM-05 or above) within Department of Veterans Affairs that reports directly to the position outlined in Column 3	Column 5 Any analyst position within the Access to Information and Privacy (ATIP) of the Department of Veterans Affairs that reports directly to the positions outlined in Column 4
8(2)(j)	Disclosure for research or statistical purposes	X	X	X		
8(2)(m)	Disclosure in the public interest or in the interest of the individual	X	X	X		
8(5)	Notice of disclosure under paragraph 8(2)(m)	X	X	X		
9(4)	Consistent uses	X	X	X	X	
10	Personal information banks	X	X	X	X	
14(a)	Notice when access requested	X	X	X	X	
14(b)	Giving access to the record	X	X	X	X	
15	Extension of time limits	X	X	X	X	X
17(2)(b)	Language of access	X	X	X	X	X

Privacy Act Provisions and associated descriptions		Column 1 Deputy Minister and Associate DM	Column 2 All Assistant Deputy Ministers, the Director General of Communications and senior management positions within the Department of Veterans Affairs Canada that reports directly to the positions outlined in Column 1	Column 3 Privacy Coordinator within the Department of Veterans Affairs Canada	Column 4 Any senior analyst position (PM-05 or above) within Department of Veterans Affairs that reports directly to the position outlined in Column 3	Column 5 Any analyst position within the Access to Information and Privacy (ATIP) of the Department of Veterans Affairs that reports directly to the positions outlined in Column 4
17(3)(b)	Access in an alternative format	X	X	X	X	X
18(2)	Exempt banks	X	X	X	X	
19	Information obtained in confidence	X	X	X	X	
20	Federal-provincial affairs	X	X	X	X	
21	International affairs and defence	X	X	X	X	
22	Law enforcement and investigations	X	X	X	X	
23	Security clearances	X	X	X	X	
24	Individuals sentenced for an offence	X	X	X	X	
25	Safety of individuals	X	X	X	X	
26	Information about another individual	X	X	X	X	
27	Solicitor-client privilege	X	X	X	X	
28	Medical records	X	X	X	X	
31	Notice of intention to investigate	X	X	X		

Privacy Act Provisions and associated descriptions		Column 1 Deputy Minister and Associate DM	Column 2 All Assistant Deputy Ministers, the Director General of Communications and senior management positions within the Department of Veterans Affairs Canada that reports directly to the positions outlined in Column 1	Column 3 Privacy Coordinator within the Department of Veterans Affairs Canada	Column 4 Any senior analyst position (PM-05 or above) within Department of Veterans Affairs that reports directly to the position outlined in Column 3	Column 5 Any analyst position within the Access to Information and Privacy (ATIP) of the Department of Veterans Affairs that reports directly to the positions outlined in Column 4
33(2)	Right to make representations	X	X	X	X	
35(1)	Notice of actions to implement recommendations of Commissioner	X	X	X		
35(4)	Access to be given to complainant	X	X	X	X	
36(3)(b)	Notice of actions to implement recommendations of Commissioner concerning exempt banks	X	X	X		
51(2)(b) 51(3)	Special rules for hearings	X	X			
72	Annual report to Parliament	X	X	X		

Privacy Regulations Provisions and associated descriptions						
11(2).1 1(4)	Notification concerning corrections	X	X	X	X	X
13(1)	Disclosure of personal information relating to physical or mental health	X	X	X		
14	Examination in presence of medical practitioner or psychologist	X	X	X		

The following portion of the Delegation Order applies to records and information that are created, collected, maintained, used and disclosed by the Office of the Veterans Ombudsman.

Position	Privacy Act	Privacy Regulations
Veterans Ombudsman	Full delegation	Full delegation
Director General of Operation	Full delegation	Full delegation
Legal Advisor	Full delegation	Full delegation
Director of Corporate Services and Charlottetown Operations	Full delegation	Full delegation


 Minister of Veterans Affairs

MAR 25 2019

 Date

Annex 2: Statistical Report on the *Privacy Act*



Government of Canada / Gouvernement du Canada

Statistical Report on the *Privacy Act*

Name of institution: Veterans Affairs Canada

Reporting period: 2018-04-01 to 2019-03-31

Part 1: Requests Under the *Privacy Act*

	Number of Requests
Received during reporting period	948
Outstanding from previous reporting period	93
Total	1041
Closed during reporting period	922
Carried over to next reporting period	119

Part 2: Requests Closed During the Reporting Period

2.1 Disposition and completion time

Disposition of Requests	Completion Time							Total
	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	
All disclosed	41	134	7	1	1	0	0	184
Disclosed in part	44	403	91	13	2	1	0	554
All exempted	0	0	0	0	0	0	0	0
All excluded	0	1	0	0	0	0	0	1
No records exist	26	29	2	0	0	0	0	57
Request abandoned	82	35	2	0	0	0	0	119
Neither confirmed nor denied	5	1	1	0	0	0	0	7
Total	198	603	103	14	3	1	0	922

2.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(a)(i)	1	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)	2	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	1
19(1)(e)	0	22(2)	0	26	560
19(1)(f)	0	22.1	0	27	4
20	0	22.2	0	28	4
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	86	96	2
Disclosed in part	200	352	2
Total	286	448	4

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	16675	13529	184
Disclosed in part	271607	231315	554
All exempted	0	0	0
All excluded	4	0	1
Request abandoned	1062	533	119
Neither confirmed nor denied	0	0	7
Total	289348	245377	865

2.5.2 Relevant pages processed and disclosed by size of requests

Disposition	Less Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
All disclosed	170	3311	6	957	5	3492	3	5769	0	0
Disclosed in part	289	10385	136	31341	53	38057	75	144424	1	7108
All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	1	0	0	0	0	0	0	0	0	0
Request abandoned	118	127	1	406	0	0	0	0	0	0
Neither confirmed nor denied	7	0	0	0	0	0	0	0	0	0
Total	585	13823	143	32704	58	41549	78	150193	1	7108

2.5.3 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	0	0	0	0	0
Disclosed in part	5	0	0	0	5
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	0	5

2.6 Deemed refusals

2.6.1 Reasons for not meeting statutory deadline

Number of Requests Closed Past the Statutory Deadline	Principal Reason			
	Workload	External Consultation	Internal Consultation	Other
65	34	2	7	22

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	35	2	37
16 to 30 days	12	2	14
31 to 60 days	7	1	8
61 to 120 days	3	1	4
121 to 180 days	1	1	2
181 to 365 days	0	0	0
More than 365 days	0	0	0
Total	58	7	65

2.7 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	4	0	4
Total	4	0	4

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

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

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

Disposition of Requests Where an Extension Was Taken	15(a)(i) Interference With Operations	15(a)(ii) Consultation		15(b) Translation or Conversion
		Section 70	Other	
All disclosed	0	0	0	0
Disclosed in part	23	0	4	1
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	23	0	4	1

5.2 Length of extensions

Length of Extensions	15(a)(i) Interference with operations	15(a)(ii) Consultation		15(b) Translation purposes
		Section 70	Other	
1 to 15 days	0	0	0	0
16 to 30 days	23	0	4	1
Total	23	0	4	1

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

Recommendation	Number of Days Required to Complete Consultation Requests							Total
	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	
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

Recommendation	Number of days required to complete consultation 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	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

Number of Days	Fewer Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	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

Number of Days	Fewer Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	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
5	7	5	0	17

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		\$1,674,554
Overtime		\$0
Goods and Services		\$71,472
• Professional services contracts	\$0	
• Other	\$71,472	
Total		\$1,746,026

10.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	20.98
Part-time and casual employees	1.47
Regional staff	0.00
Consultants and agency personnel	0.00
Students	0.68
Total	23.13

Note: Enter values to two decimal places.

Statistical Report on the *Privacy Act*
New Exemptions Table

<i>Privacy Act</i>	
Section	Number of requests
22.4 National Security and Intelligence Committee	0
27.1 Patent or Trademark privilege	0

Annex 3: Five-Year Statistical Analysis

	2014– 2015	2015– 2016	2016– 2017	2017– 2018	2018– 2019	Variance 2018–2019 and 2017–2018
Requests received	663	763	743	941	948	+1%
Requests carried forward from prior year	179	81	86	99	93	-6%
Total requests requiring action	842	844	829	1040	1041	+-%
Completed requests	771	757	730	947	922	-3%
Requests carried forward to next year	71	87	99	93	119	+28%
Completed in 30 days or less	370	561	496	778	801	+5%
Exemptions invoked	508	408	409	557	572	+3%
Pages released	256,953	198,889	177,469	346,931	245,377	-29%
<i>Privacy Act</i> —Total costs of administration	\$1,985,624	\$1,533,008	\$1,454,661	\$1,426,905	\$1,746,026	+22%
FTEs	24.14	18.18	20.18	20.28	23.13	+14%
Complaints received	2	4	4	12	5	-58%
Complaints ruled on	18	7	3	12	5	-58%
PIAs completed	1	12	4	5	4	-20%

Annex 4: Definitions of Dispositions

These definitions provide a brief explanation of the status of a completed request.

All disclosed:

All the records relevant to the request were disclosed to the applicant (i.e., without the application of any exemptions or exclusions).

All exempted:

No information was disclosed because all of the information requested qualified for exemption. For example, exemptions may be applied to personal information or information related to advice or recommendations developed by or for a government institution.

All excluded:

No information was disclosed because all of the information requested qualified for exclusion. Excluded information would include publicly available information or Confidences of the Queen's Privy Council. The *Access to Information Act* does not apply to published material or material available for purchase by the public.

Disclosed in part:

Only a portion of the information requested was disclosed because the remainder was exempt and/or excluded. For example, exemptions may be applied to personal information or information related to advice or recommendations developed by or for a government institution. Excluded information would include publicly available information or Confidences of the Queen's Privy Council. Excluded information is addressed in sections 68 and 69 of the *Access to Information Act*. The *Access to Information Act* does not apply to published material or material available for purchase by the public.

Does not exist:

The request provided sufficient information to identify the specific information sought but no relevant records were found.

Neither confirmed nor denied:

The Department could neither confirm nor deny the existence of any records pertaining to the request.

Request abandoned:

The request was abandoned either by the requester, or following a lack of response from the requester to a clarification letter.

Request transferred:

The request was transferred to another government department that was better suited to respond to the request.

Annex 5: Office of the Veterans Ombudsman Annual Report on the Administration of the *Privacy Act*

Introduction:

The Office of the Veterans Ombudsman (OVO) takes the responsibility to protect the privacy of Veterans and their families very seriously.

This annual report on the administration to the *Privacy Act* describes how the Office of the Veterans Ombudsman fulfilled their responsibilities under the *Privacy Act* during the fiscal year April 1, 2018 to March 31, 2019. This report is prepared and tabled in Parliament in accordance with section 72 of the *Privacy Act*.

The mandate of the OVO is to:

- Review and address complaints by Veterans and other individuals served by VAC and their representatives arising from the application of the provisions of the *Veterans Bill of Rights*;
- Identify and review emerging and systemic issues related to programs and services provided or administered by the Department or by third parties on the Department's behalf that impact negatively on Veterans and other individuals served by VAC;
- Review and address complaints by Veterans and other individuals served by VAC and their representatives related to programs and services provided or administered by the Department or by third parties on the Department's behalf, including decisions related to the programs and services for which there is no right of appeal to the Veterans Review and Appeal Board;
- Review systemic issues related to the Veterans Review and Appeal Board; and,
- Facilitate access by stakeholders to programs and services by providing them with information and referrals.

Organizational Structure:

The Veterans Ombudsman, Deputy Ombudsman and Executive Director, Legal Advisor, and Director – Corporate Services and Charlottetown Operations have full authority for the OVO to exercise the powers, duties, and functions of the Minister as the Head of Veterans Affairs under the provisions of the *Acts* and related regulations. Although four positions have been delegated full authority, the Director – Corporate Services and Charlottetown Operations, is responsible for management of the Access to Information and Privacy Unit function within the OVO.

The OVO's Access to Information and Privacy Unit in Charlottetown, Prince Edward Island ensures that the Office's responsibilities under both acts are met. Processing of requests is centralized within the unit. The Unit consists of the Director - Corporate Services and Charlottetown Operations, Knowledge Management Coordinator and Internal Services Project

Officer. These staff members were assigned to the administration of both acts on a part time (as required) basis during the 2018-19 reporting period, which represents 0.14 of a FTE.

The main activities of the OVO ATIP Unit include:

- Processing OVO requests for information submitted under the *Access to Information Act* and *The Privacy Act*, including consulting with other federal departments and third parties with respect to ATIP requests received;
- Developing OVO policies, procedures, guidelines and processes in support of Access to Information and Privacy and central agency requirements;
- Monitoring legislative and regulatory changes that impact ATIP;
- Providing awareness and training on ATIP to ensure that OVO employees understand their roles and responsibilities;
- Monitoring OVO compliance with both acts, regulations and central agency requirements;
- Preparing and providing information specific to the OVO to VAC for inclusion in annual reports to Parliament on the administration of the *Acts*;
- Leading the development of Privacy Impact Assessments (PIAs) for the OVO;
- Working closely with VAC for the resolution of any complaints against OVO which have been submitted to the Information Commissioner of Canada and the Privacy Commissioner of Canada;
- Providing centralized management of privacy breaches within the OVO;
- Providing advice, guidance and training to OVO staff on ATIP issues;
- Analyzing and responding to OVO privacy and access to information policy issues;
- Reviewing new and amended OVO forms and processes that impact the collection of personal information
- Developing appropriate Privacy Notice Statements for the OVO; and,
- Evaluating OVO contracts and Memoranda of Understanding.

Delegation Order:

The responsibilities associated with the administration of the *Privacy Act* are delegated to departmental and OVO officials through a delegation order (see Annex 1).

Highlights of the Statistical Report 2018-19:

- All requests were responded to within the legislated timelines
 - Of the 3 requests, 2 were closed in less than 15 days
- There were no extensions of timelines
- There was no consultation with other institutions

The completed statistical report for 2018-19 is included.

Training and Awareness:

OVO staff took part in Departmental ATIP training and OVO ATIP Refresher training.

Policies, Guidelines, Procedures and Initiatives

The OVO continues to work on an Open Government action plan and will continue the transition to having more information available on the Open Government portal. The OVO has completed the required steps to be part of ATIP Online Request Services (AORS) where users can submit ATIP requests online and view past ATI requests by subject.

The OVO also maintained and monitored current Access to Information policies, guidelines and procedures during the 2018-19 reporting period.

Summary of Key Issues and Actions Taken on Complaints or Audits:

In the 2018-19 reporting period, OVO received no complaints in relation to privacy requests. No complaints were carried over from 2017-18. The OVO had no audits or investigations concluded during the reporting period.

Monitoring Compliance:

The OVO uses a tracking spreadsheet to monitor the processing of requests for access to information on a weekly basis when requests are being processed. This tracking spreadsheet is maintained by the Knowledge Management Coordinator. Any anticipated issues with processing are escalated to the Director – Corporate Services and Charlottetown Operations.

Material Privacy Breaches:

There were no material privacy breaches were reported to the Office of the Privacy Commissioner and to the Information and Privacy Policy Division, Treasury Board of Canada Secretariat during the reporting period.

Privacy Impact Assessments:

There were no material privacy breaches were reported to the Office of the Privacy Commissioner and to the Information and Privacy Policy Division, Treasury Board of Canada Secretariat during the reporting period.

Public Interest Disclosures:

There were no material privacy breaches were reported to the Office of the Privacy Commissioner and to the Information and Privacy Policy Division, Treasury Board of Canada Secretariat during the reporting period.

New Exemptions:

Privacy Act	
Section	Number of requests
22.4 National Security and Intelligence Committee	0
27.1 Patent or Trademark privilege	0



Statistical Report on the *Privacy Act*

Name of institution: Office of the Veterans Ombudsman

Reporting period: 2018-04-01 to 2019-03-31

Part 1: Requests Under the *Privacy Act*

	Number of Requests
Received during reporting period	3
Outstanding from previous reporting period	0
Total	3
Closed during reporting period	3
Carried over to next reporting period	0

Part 2: Requests Closed During the Reporting Period

2.1 Disposition and completion time

Disposition of Requests	Completion Time							Total
	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	
All disclosed	2	1	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
No records exist	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	2	1	0	0	0	0	0	3

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	3	0	0
Disclosed in part	0	0	0
Total	3	0	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	64	64	3
Disclosed in part	0	0	0
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	0	0	0
Neither confirmed nor denied	0	0	0
Total	64	64	3

2.5.2 Relevant pages processed and disclosed by size of requests

Disposition	Less Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
All disclosed	3	64	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	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	3	64	0	0	0	0	0	0	0	0

2.5.3 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	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 Requests Closed Past the Statutory Deadline	Principal Reason			
	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

Disposition of Requests Where an Extension Was Taken	15(a)(i) Interference With Operations	15(a)(ii) Consultation		15(b) Translation or Conversion
		Section 70	Other	
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	0	0	0	0
Request abandoned	0	0	0	0
Total	0	0	0	0

5.2 Length of extensions

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

Recommendation	Number of Days Required to Complete Consultation Requests							Total
	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	
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

Recommendation	Number of days required to complete consultation requests							Total
	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	
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

Number of Days	Fewer Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	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

Number of Days	Fewer Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	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		\$8,522
Overtime		\$0
Goods and Services		\$0
• Professional services contracts	\$0	
• Other	\$0	
Total		\$8,522

10.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.14
Part-time and casual employees	0.00
Regional staff	0.00
Consultants and agency personnel	0.00
Students	0.00
Total	0.14

Note: Enter values to two decimal places.