



Office of the
Chief Electoral Officer
of Canada

Annual Report on the *Privacy Act*

**For the period ending
March 31, 2020**

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Table of Contents

1. Introduction.....	5
1.1. Mandate of the Office of the Chief Electoral Officer	5
1.2. Structure of the Access to Information and Privacy Office	6
2. Administration of the <i>Privacy Act</i>.....	9
2.1. Education and training	9
2.2. Institutional privacy policies and procedures	9
2.3. Institutional monitoring of privacy requests.....	9
2.4. Material privacy breaches	9
2.5. Privacy impact assessments.....	10
3. Statistical Report on Requests under the <i>Privacy Act</i>.....	11
3.1. Number of requests.....	11
3.2. Disposition of completed requests	11
3.3. Completion time of requests	12
3.4. Disclosures of personal information under paragraph 8(2)(m)	12
3.5. Fees and Costs	13
4. Complaints	15
Appendix I: Delegation of Authority	17
Appendix II: Statistical Report on the <i>Privacy Act</i>, 2019-2020	19

1. Introduction

The Privacy Act (the Act) extends to Canadians and individuals present in Canada the right to access their personal information from federal government institutions. The Act also protects individuals' privacy by preventing others from having access to their personal information. Furthermore, it limits federal institutions' use of the personal information that they collect and retain.

Section 72 of the Act requires that the head of every institution subject to the Act prepare an annual report for tabling in Parliament. This report describes how Elections Canada administered its responsibilities under the Act during the reporting period of April 1, 2019, to March 31, 2020.

1.1. Mandate of the Office of the Chief Electoral Officer

The Office of the Chief Electoral Officer, commonly known as Elections Canada, is an independent, non-partisan agency that reports directly to Parliament. Its mandate is to:

- be prepared to conduct a federal general election, by-election or referendum;
- administer the political financing provisions of the *Canada Elections Act*;
- monitor compliance with electoral legislation;
- conduct public information campaigns on voter registration, voting and becoming a candidate;
- conduct education programs for students on the electoral process;
- provide support to the independent commissions in charge of adjusting the boundaries of federal electoral districts following each decennial census;
- carry out studies on alternative voting methods and, with the approval of parliamentarians, test alternative voting processes for future use during electoral events; and,
- provide assistance and cooperation in electoral matters to electoral agencies in other countries or to international organizations.

In fulfilling its mandate, Elections Canada also has the responsibility to:

- appoint, train and support returning officers and retain the services of field liaison officers across Canada;
- maintain the National Register of Electors, which is used to prepare preliminary lists of electors at the start of electoral events;
- publish reports on the conduct of elections and official voting results;
- maintain electoral geography information, which provides the basis for maps and other geographic products;

- register political entities, including political parties, electoral district associations, candidates, nomination contestants, leadership contestants, third parties that engage in election advertising and referendum committees;
- administer the reimbursements and subsidies paid to eligible candidates, registered political parties and auditors;
- disclose information on registered parties and electoral district associations, registered parties' nomination and leadership contestants, candidates, third parties and referendum committees, including their financial returns;
- appoint the Commissioner of Canada Elections, after consultation with the Director of Public Prosecutions;
- refer to the Commissioner of Canada Elections information concerning possible offences under the *Canada Elections Act* (or other relevant acts);
- consult the Advisory Committee of Political Parties for advice and recommendations;
- issue written opinions, guidelines and interpretation notes on the application of the *Canada Elections Act* to political entities;
- recommend to Parliament amendments for the better administration of the *Canada Elections Act* by submitting a recommendations report after a general election, as well as by providing expert advice and other special reports; and,
- appoint the Broadcasting Arbitrator, who is responsible for allocating free and paid broadcasting time among political parties and for arbitrating disputes that may arise between parties and broadcasters.

1.2. Structure of the Access to Information and Privacy Office

The Access to Information and Privacy (ATIP) Office is part of the Information and IT Services Management Directorate within the Chief Information and Security Officer Branch of the Internal Services Sector. It is managed on a full-time basis by the agency's ATIP Coordinator, with two additional full-time staff as well as full-time consultant(s) as required.

The ATIP Office is responsible for the following activities:

- processing requests under the *Access to Information Act* and the *Privacy Act* (the Acts);
- responding to consultation requests from other government institutions;
- providing advice and guidance to senior management and staff of Elections Canada on privacy issues and PIAs;
- developing and delivering awareness training to Elections Canada managers and employees on how to fulfill their obligations under the Acts;
- developing policies, procedures and guidelines in support of ATIP legislation and central agency requirements;
- monitoring institutional compliance with the Acts, procedures and policies;

- acting on behalf of Elections Canada in dealings with the Treasury Board Secretariat, the offices of the Information Commissioner and Privacy Commissioner of Canada and other government institutions regarding ATIP affairs;
- preparing annual reports to Parliament, in addition to other statutory reports and materials that may be required by central agencies;
- preparing and publishing the annual update of Elections Canada's chapter of *Info Source*, describing the agency's record holdings and personal information banks; and,
- representing Elections Canada by participating in ATIP community forums, such as the Treasury Board Secretariat's ATIP Community meetings.

2. Administration of the *Privacy Act*

2.1. Education and training

Privacy training at Elections Canada typically involves educating staff on the principles of the Act; how to securely manage privacy requests and protect personal information. In the 2019–2020 fiscal year, Elections Canada delivered 6 formal ATIP training and awareness sessions for 56 employees of various levels. All of the sessions provided an overview of the ATIP process, legislation, roles and responsibilities. A presentation was also given to the Enterprise Project Management Office team on Elections Canada's Privacy Breach Protocol. The ATIP Office also raised awareness of privacy issues throughout the agency when providing advice on the collection, retention, use and disclosure of personal information.

2.2. Institutional privacy policies and procedures

Elections Canada updated its Privacy Breach Protocol before the 43rd general election. Several information tools and guidance documents were developed to assist employees of the institution understand their privacy responsibilities. Towards the end of the reporting period, Elections Canada adjusted its ATIP request procedures for Offices of Primary Interest (OPI) to allow for the electronic sign-off by executive committee members of OPI responses to ATIP requests. The ATIP Office also started to send out responses to requesters electronically, whenever possible, instead of by regular mail or courier. These changes were implemented because of the situation with COVID-19 and the transition to remote work.

Elections Canada is continuing to review its other ATIP tools and procedures and update them as required.

2.3. Institutional monitoring of privacy requests

The ATIP Office uses its case management software to monitor the status of each request being processed, including the number of days remaining before the statutory deadline. A weekly progress report of all open and recently closed files is regularly provided to senior officials, including the Chief Electoral Officer and the Executive Committee.

2.4. Material privacy breaches

A material privacy breach is any unauthorized collection, use, disclosure, retention or disposal of sensitive personal information that could reasonably be expected to cause injury or harm to the individual.

No material privacy breaches were reported to the Office of the Privacy Commissioner or to the Treasury Board of Canada Secretariat by Elections Canada during the reporting period.

2.5. Privacy impact assessments

Elections Canada consistently conducts privacy impact assessments (PIA) to address privacy risks in new or existing departmental programs, initiatives or projects that manage personal information.

One PIA was completed by Elections Canada during the 2019–2020 fiscal year. The PIA looked at the risks to privacy associated with Elections Canada's Political Entities Service Centre (PESC). The PESC is Elections Canada's online portal for candidates, their campaigns, and political entities. It provides political entities online access to a variety of electoral services and documents.

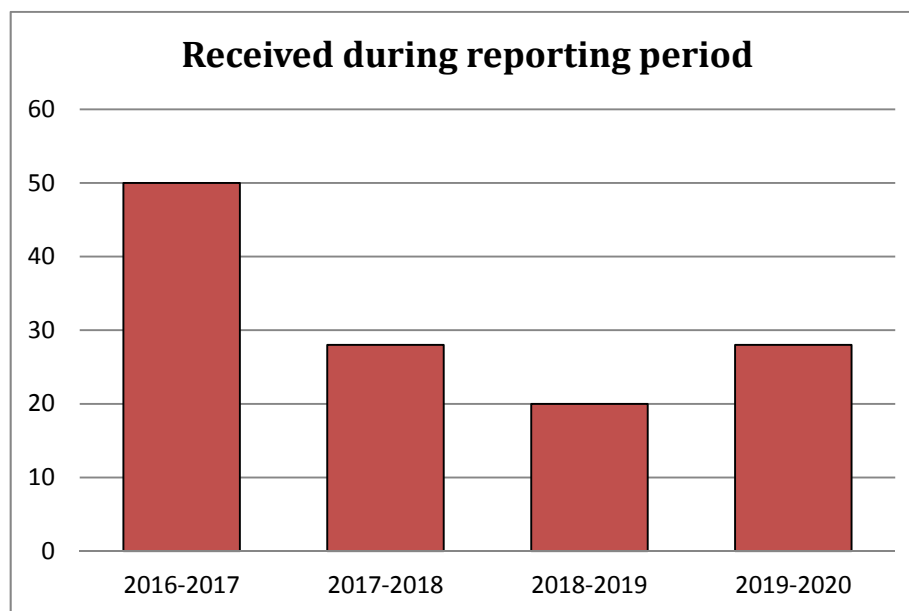
The PIA summaries can be found on the EC website at elections.ca > Resource Centre > Reports > Proactive Disclosure > Privacy Impact Assessments, where available.

3. Statistical Report on Requests under the *Privacy Act*

This section provides an interpretation of several statistics on the processing of requests made to Elections Canada under the Act. All figures and data for the 2019-2020 fiscal year are provided in the attached statistical report (see Appendix II).

3.1. Number of requests

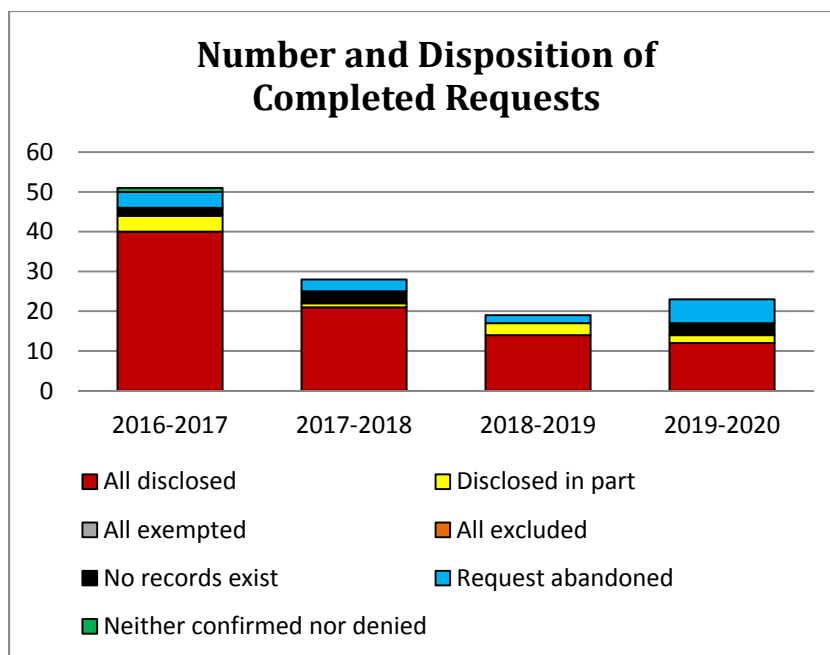
Elections Canada received 28 formal requests for personal information during 2019–2020, a 40 percent increase from the previous year. Twenty three requests were processed during the reporting period and eight requests were carried over into the new fiscal year.



Elections Canada did not receive any consultations from other institutions during the reporting period.

3.2. Disposition of completed requests

Of the 23 requests completed during the reporting period, 12 resulted in full disclosure of the information requested. This represents 52 percent of all completed requests, a decrease from the previous fiscal year during which 74 percent resulted in full disclosure. Two requests resulted in partial disclosure, where personal information of individuals unassociated with the request was exempted further to section 26 of the Act or information subject to solicitor–client privilege was exempted further to section 27 of the Act. Records did not exist for 3 requests and 6 requests were abandoned by the applicants.



3.3. Completion time of requests

In 2019-2020, a total of 20 requests (87 percent) were completed within 30 days, compared to 95 percent in 2018-2019. Ninety-six percent (22) of the requests were completed within legislated timelines. Elections Canada has historically received simple privacy requests that are uncomplicated to process, primarily requests for information from the National Register of Electors. However, 3 requests received in 2019-2020 (13 percent), were more complicated to process and closed within 61 to 120 days. The 3 requests involved information from staffing processes, employment files or election documents that had been sealed in poll bags after the 43rd general election. Unforeseen adjustments to work processes related to COVID-19 were implemented towards the end of 2019-2020, temporarily affecting the processing of some requests under the Act. Most employees, including ATIP staff, were required to work remotely with limited access to the network and paper files.

3.4. Disclosures of personal information under paragraph 8(2)(m)

Subsection 8(2) of the Act stipulates that a government institution may disclose personal information under its control without the consent of those whom the information relates. Such disclosures are discretionary and are subject to any other act of Parliament.

Paragraph 8(2)(m) allows an institution to disclose personal information for any purpose where, in the opinion of the head of the institution, the public interest in the disclosure clearly outweighs any invasion of privacy that could result from it or where the disclosure would clearly benefit the individual to whom the information relates.

In accordance with previous years, Elections Canada did not disclose any personal information pursuant to paragraph 8(2)(m) in the 2019-2020 fiscal year.

3.5. Fees and Costs

There is no charge to individuals for processing requests under the Act.

During this reporting period, the ATIP Office expended \$207,172 to administer the Act. Salaries accounted for \$76,964 of this total, whereas spending on goods and services amounted to \$130,208.

4. Complaints

Individuals who disagree with the handling of their personal information or the processing of a request under the Act can file a complaint with the Office of the Privacy Commissioner of Canada (OPC).

There was no complaint against Elections Canada filed with the OPC in 2019-2020.

Appendix I: Delegation of Authority



DÉLÉGATION EN VERTU DE L'ARTICLE 73 DE LA LOI SUR LA PROTECTION DES RENSEIGNEMENTS PERSONNELS

En vertu de l'article 73 de la *Loi sur la protection des renseignements personnels*, par la présente je délègue au titulaire du poste de Directeur adjoint, Accès à l'information et protection des renseignements personnels, ou en l'absence de cette personne, au titulaire du poste de Directeur, Gestion de l'information et des services informatiques, y compris toutes personnes nommées à ces deux postes de manière intérimaire, les attributions en lien avec les documents qui relèvent du directeur général des élections, dont je suis, en qualité de responsable d'une institution fédérale, investi conformément à la *Loi sur la protection des renseignements personnels*, à l'exception des documents qui relèvent exclusivement du Commissaire aux élections fédérales.

En vertu de l'article 73 de la *Loi sur la protection des renseignements personnels*, par la présente je délègue au titulaire du poste de Commissaire aux élections fédérales, ainsi qu'au titulaire du poste de Directeur adjoint, Accès à l'information et protection des renseignements personnels, ou en l'absence de cette personne, au titulaire du poste de Directeur, Gestion de l'information et des services informatiques, y compris toutes personnes nommées à ces trois postes de manière intérimaire, les attributions en lien avec les documents qui relèvent exclusivement du Commissaire aux élections fédérales dont je suis, en qualité de responsable d'une institution fédérale, investi conformément à la *Loi sur*

DELEGATION ORDER PURSUANT TO SECTION 73 OF THE PRIVACY ACT

Pursuant to section 73 of the *Privacy Act*, I hereby designate the person appointed to the position of Assistant Director, Access to Information and Privacy, or in that person's absence, the person appointed to the position of Director, Information and IT Services Management, including any persons appointed to these two positions on an acting basis, to exercise or perform any of the powers, duties and functions related to the records that are under the control of the Chief Electoral Officer, conferred upon me as the head of the government institution by the *Privacy Act*, except as it relates to the records that are exclusively under the control of the Commissioner of Canada Elections.

Pursuant to section 73 of the *Privacy Act*, I hereby designate the person appointed to the position of Commissioner of Canada Elections, as well as the person appointed to the position of Assistant Director, Access to Information and Privacy, or in that person's absence, the person appointed to the position of Director, Information and IT Services Management, including any persons appointed to these three positions on an acting basis, to exercise or perform any of the powers, duties and functions conferred upon me as the head of the government institution by the *Privacy Act* and that are related to the records that are exclusively under the control of the Commissioner of Canada Elections.

la protection des renseignements personnels.

Il est entendu que cette délégation remplace toutes délégations antérieures de ma part ou de la part de mes prédécesseurs émises en vertu de l'article 73 de la *Loi sur la protection des renseignements personnels*.

For greater certainty, this delegation supersedes all previous delegations by me or my predecessors made pursuant to section 73 of the *Privacy Act*.

Signée à Gatineau le / Signed in Gatineau on 5.04.2019



Stéphane Perrault

Directeur général des élections / Chief Electoral Officer

Appendix II: Statistical Report on the *Privacy Act*, 2019-2020



Statistical Report on the *Privacy Act*

Name of institution: Office of the Chief Electoral Officer (Elections Canada)

Reporting period: 2019-04-01 to 2020-03-31

Section 1: Requests Under the *Privacy Act*

1.1 Number of requests

	Number of Requests
Received during reporting period	28
Outstanding from previous reporting period	3
Total	31
Closed during reporting period	23
Carried over to next reporting period	8

Section 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	6	4	0	2	0	0	0	12
Disclosed in part	1	0	0	1	0	0	0	2
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	0	0	0	0	0	3
Request abandoned	6	0	0	0	0	0	0	6
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	15	5	0	3	0	0	0	23

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	2
19(1)(f)	0	22.1	0	27	1
20	0	22.2	0	27.1	0
21	0	22.3	0	28	0
		22.4	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

Paper	Electronic	Other
11	3	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
463	462	20

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	12	26	0	0	0	0	0	0	0	0
Disclosed in part	1	1	1	435	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	6	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	19	27	1	435	0	0	0	0	0	0

2.5.3 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	1	1	0	0	2
Disclosed in part	1	1	0	0	2
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	2	2	0	0	4

2.6 Closed requests

2.6.1 Number of requests closed within legislated timelines

	Requests closed within legislated timelines
Number of requests closed within legislated timelines	22
Percentage of requests closed within legislated timelines (%)	95.7

2.7 Deemed refusals

2.7.1 Reasons for not meeting legislated timelines

Number of Requests Closed Past the Legislated Timelines	Principal Reason			
	Interference with Operations / Workload	External Consultation	Internal Consultation	Other
1	0	0	0	1

2.7.2 Requests closed beyond legislated timelines (including any extension taken)

Number of Days Past Legislated Timelines	Number of Requests Past Legislated Timeline Where No Extension Was Taken	Number of Requests Past Legislated Timelines Where an Extension Was Taken	Total
1 to 15 days	0	0	0
16 to 30 days	0	0	0
31 to 60 days	1	0	1
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	1	0	1

2.8 Requests for translation

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

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

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Subsection 8(5)	Total
1	0	0	1

Section 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

Section 5: Extensions

5.1 Reasons for extensions and disposition of requests

Number of requests where an extension was taken	15(a)(i) Interference with operations				15 (a)(ii) Consultation			15(b) Translation purposes or conversion
	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet Confidence Section (Section 70)	External	Internal	
3	0	0	0	1	0	1	1	0

5.2 Length of extensions

Length of Extensions	15(a)(i) Interference with operations				15 (a)(ii) Consultation			15(b) Translation purposes or conversion
	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet Confidence Section (Section 70)	External	Internal	
1 to 15 days	0	0	0	0	0	0	0	0
16 to 30 days	0	0	0	1	0	1	1	0
31 days or greater								0
Total	0	0	0	1	0	1	1	0

Section 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
Carried over to the next 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

Section 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

Section 8: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
0	0	0	0	0

Section 9: Privacy Impact Assessments (PIA) and Personal Information Banks (PIB)

9.1 Privacy Impact Assessments

Number of PIA(s) completed	1
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9.2 Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
	10	1	0	0

Section 10: Material Privacy Breaches

Number of material privacy breaches reported to TBS	0
Number of material privacy breaches reported to OPC	0

Section 11: Resources Related to the *Privacy Act*

11.1 Costs

Expenditures		Amount
Salaries		\$76,964
Overtime		\$0
Goods and Services		\$130,208
• Professional services contracts	\$128,560	
• Other	\$1,648	
Total		\$207,172

11.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.77
Part-time and casual employees	0.00
Regional staff	0.00
Consultants and agency personnel	1.00
Students	0.00
Total	1.77

Note: Enter values to two decimal places.

Supplemental Statistical Report on the *Privacy Act*

The following table reports the total number of formal requests received during two periods; 2019-04-01 to 2020-03-13 and 2020-03-14 to 2020-03-31.

Table 4 – Requests Received

Column (Col.) 1

		Number of requests
Row 1	Received from 2019-04-01 to 2020-03-13	26
Row 2	Received from 2020-03-14 to 2020-03-31	2
Row 3	Total¹	28

¹ – Total for Row 3 should equal the total in the Privacy Statistical Report Section 1.1 Row 1

The following table reports the total number of requests closed within the legislated timelines and the number of closed requests that were deemed refusals during two periods 2019-04-01 to 2020-03-13 and 2020-03-14 to 2020-03-31.

Table 5 – Requests Closed

Col. 1

Col. 2

		Number of requests closed within the legislated timelines	Number of requests closed past the legislated timelines
Row 1	Received from 2019-04-01 to 2020-03-13 and outstanding from previous reporting periods	22	1
Row 2	Received from 2020-03-14 to 2020-03-31	0	0
Row 3	Total²	22	1

² – Total for Row 3 Col. 1 should equal the total in the Privacy Statistical Report Section 2.6.1 Row 1 -- Total for Row 3 Col. 2 should equal the total in the Privacy Statistical Report Section 2.7.1. Col. 1 Row 1

The following table reports the total number of requests carried over during two periods; 2019-04-01 to 2020-03-13 and 2020-03-14 to 2020-03-31.

Table 6– Requests Carried Over

		Col. 1
		Number of requests
Row 1	Requests from 2019-04-01 to 2020-03-13 and outstanding from previous reporting period that were carried over to the 2020-2021 reporting period	6
Row 2	Requests from 2020-03-14 to 2020-03-31 that were carried over to the 2020-2021 reporting period	2
Row 3	Total³	8

³ – Total for Row 3 should equal the total in the Privacy Statistical Report Section 1.1 Row 5