



Annual Report to Parliament **2018-2019** On the Access to Information Act and the Privacy Act



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Chapter One: *Access to Information Act* Report

Introduction

The 2018-2019 Annual Report on the administration of the *Access to Information Act* details the manner in which the Royal Canadian Mounted Police discharged its responsibilities in relation to the *Act*, during fiscal year 2018-2019.

The *Access to Information Act* gives Canadian citizens, permanent residents, and any person or corporation present in Canada, a right of access to information contained in government records, subject to limited and specific exceptions.

As outlined in Section 72(1) of the *Access to Information Act*, the head of every government institution must prepare for submission to Parliament, an Annual Report on the administration of the *Act* within the institution during each financial year.

In fiscal year 2018-2019, the RCMP continued to establish new procedures and practices in order to ensure the sustained provision of timely service to Canadians who seek to exercise their right to access records under the *Act*.

Organization

About the Royal Canadian Mounted Police

The Royal Canadian Mounted Police is Canada's national police force. As a federal, provincial and municipal policing organization, the RCMP provides federal policing services to all Canadians and policing services under contract to the three territories, eight provinces, and more than 180 municipalities, 600 Aboriginal communities and three international airports.

The RCMP is governed by the *Royal Canadian Mounted Police Act*. In accordance with the *Act*, it is headed by a Commissioner who, under the direction of the Minister of Public Safety, has control and management of the Force.

The organization is sub-divided into 15 Divisions, and a National Headquarters in Ottawa, each of which is under the direction of a Commanding Officer. Nationally, there are more than 750 detachments across Canadian communities.

The RCMP is structured by business line, as follows: Federal Policing; Contract and Indigenous Policing; Specialized Policing Services; Corporate Management; Human Resources; Internal Audit and Evaluation; Legal Services; Office of the Ethics Advisor; and, Strategic Policy and Planning Directorate. Business lines are guided by strategic priorities that are reviewed periodically to ensure both operational and organizational efforts are aligned and focussed on maintaining a safe and secure Canada. The strategic priorities are: Serious and Organized

Crime; National Security, Youth, Indigenous Communities and Economic Integrity. Additionally, wherever possible, these priorities are supported by partnerships and integrated policing efforts.

The RCMP's scope of operations include: crime prevention, community safety, victim services, combating terrorism, organized crime, and specific crimes related to the illicit drug trade; cybercrime and economic crime such as counterfeiting and credit card fraud; and offences that threaten the integrity of Canada's national borders. The RCMP protects VIPs, including the Prime Minister and foreign dignitaries and provides the law enforcement community with a full range of specialized policing services as well as international peacekeeping.

As the RCMP approaches its 150th anniversary in 2023, it is undergoing a period of transformation with the vision of becoming an even more trusted and inclusive organization that is accountable and committed to its employees, its partners, and the communities it serves. This vision sets out its goals for modernization with a focus on its people, its culture, its stewardship, and its policing services.

Access to Information and Privacy Branch

The RCMP established the Access to Information and Privacy Branch in 1983, as the central contact point for matters arising from both the *Access to Information* and *Privacy Acts*.

The Access to Information and Privacy (ATIP) Coordinator acts on behalf of the head of the Institution as the Departmental Access to Information and Privacy Coordinator for the RCMP. The ATIP Coordinator ensures compliance with both the spirit and the intent of the *Access to Information Act*, as well as all associated regulations and guidelines.

The Access to Information and Privacy program is divided into two major areas:

- **Disclosure:** processes all formal requests under the *Access to Information Act*; and
- **Compliance:** monitors and develops internal policies, procedures and guidelines for the collection, retention, disposition, use and disclosure of all personal and non-personal information for Force-wide application, offers support to ATIP reviewers and ATIP Officer in Charge, provides guidance to the Divisions with respect to section 4 to 8 of the *Privacy Act*, reviews and creates policies that reflect Treasury Board Secretariat Policies and Directives and the Office of the Privacy Commissioner expectations in order to meet its obligations in relation to the Info Source, Annual reports, Privacy Impact Assessments and internal training within the RCMP.

The RCMP ATIP Branch also accommodates requests for informal access to records. Appointments can be arranged for individuals who wish to review records related to *Privacy Act* requests or public documents of the RCMP, either at the Divisional level or at RCMP Headquarters in Ottawa.¹

¹ To schedule an appointment, individuals may contact 1-855-629-5877. The public may access additional information about the RCMP at: <http://www.rcmp-grc.gc.ca>

Activities and Accomplishments

The RCMP remains an active participant in the support and promotion of access to information. In April 2014, the RCMP joined the Access to Information and Privacy Online Request service, which allows Canadians to submit and pay for requests online. The number of requests received by the RCMP through the online portal has increased over the past several years. During fiscal year 2014-2015, the percentage of requests received through the online portal was 51%. While the percentage rose to 61% in 2015-2016 and 64% in 2016-2017, requests declined to 55.3% in 2017-18. In 2018-2019, however, requests increased to 66%.

During the 2018-2019 fiscal year, the RCMP undertook the following initiatives to improve internal processes and client service under the *Access to Information Act*:

- Provided ATIP information sessions to RCMP employees in locations across Canada to impart a clear understanding of employee roles and responsibilities;
- Provided training to all new RCMP ATIP employees to ensure a consistent approach with respect to learning the legislation and internal processes;
- Increased ATIP employee knowledge by providing in-house training to further improve service standards;
- Held engagement meetings with numerous internal stakeholders and other federal government departments to improve dialogue and accountability.
- Implemented a Triage Team to clarify and assist requesters in obtaining responsive records;
- Ongoing modernization of processing procedures to ensure efficiencies in the time it takes to process incoming requests;
- Hired ATIP consultants to address the backlog of files;
- Implemented strategies to streamline data importation processes which resolved the backlog of approximately 800,000 pages, 1,400 CDs, 45 audio cassettes and 1,500 microfiches;
- In preparation for Bill C-58, the ATIP Branch created an Internal Working Group, participated in several interdepartmental Working Groups, provided internal briefings, presentations, and developed an Action Plan to ensure the RCMP is prepared to address the upcoming requirements.

Performance

To monitor performance under the *Act*, the compliance rate is calculated as a percentage of the number of requests processed and completed within allotted time limits over the total number of requests. The RCMP monitors compliance through weekly updates to the Chief Strategic Policy and Planning Officer of the RCMP.

During 2018-2019, the RCMP's compliance rate was 28.6% compared to 33.5% during the previous reporting period. This change in compliance can be attributed, in part, to the TBS *Interim Directive on the Administration of the Access to Information Act*, which eliminated fees prescribed by the *Act* and Regulations, other than the application fee. Consequently, there was a notable increase in complex requests in both scope and volume. The impact is evident when comparing 2018-2019 values with the previous year. While there was a 14.7% decrease in the

number of requests received under the *Access to Information Act* compared to the previous reporting period, the number of requests exceeding 5,000 pages increased by 140%. During the same period, consultations received from other organizations increased by 148% over 2017-2018 figures, and pages for review increased by 308%.

As the national institution responsible for the prevention and investigation of a broad range of criminality, spanning street level drug enforcement to violent crimes, to national security and terrorism offences, the RCMP's high-risk operating environment is both critically sensitive and exceedingly complex. Accordingly, RCMP ATIP Analysts recognize the potential impacts of the inadvertent release of investigative and intelligence information, and the need to apply rigor and diligent review of the information, which may further delay response times.

Human Resources

The RCMP ATIP Branch has a total of 77 full-time equivalent positions, all of which are fully committed to the administration of the *Access to Information Act*.

In an effort to ensure information is disclosed in a manner that does not compromise public safety / law enforcement personnel or undermine ongoing investigations, law enforcement techniques or resulting judicial processes, nearly one quarter of all ATIP Analyst positions are filled with experienced police officers, from a range of enforcement programs. This model helps reduce the need for lengthy consultations with program managers concerning Access to Information Act requests and preserves credibility with the law enforcement community, international agencies and other federal departments and information sources.

Recruiting, hiring and retaining individuals who possess the necessary skills and experience for the Access to Information and Privacy discipline is a formidable challenge confronting all federal institutions. As a result, the market for ATIP analysts is extremely competitive. The RCMP continues to work on innovative recruitment and retention strategies, while ensuring compliance rates improve. The RCMP has also successfully hired an ATIP employee through WorkLivePlay, a Canadian charitable organization that supports people with intellectual disabilities.

Moreover, the provision of internal development opportunities within the Branch allows employees to acquire and/or further their knowledge, skills and experience in Access to Information and Personal Information. Another source of assistance for the ATIP Branch is the Federal Student Work Experience Program (FSWEP), which offers the possibility of employment within the Federal Public Service at the cessation of their term. During this reporting period, the RCMP ATIP Branch bridged two students to full time employees.

Education and Awareness

The RCMP recognizes that every employee has a role to play in making government information accessible to Canadians. During this reporting period, nearly 1200 employees across the country, attended information sessions delivered by the ATIP Training Unit to become familiar with the *Access to Information Act* and their responsibilities with the ATIP process.

The ATIP Training Plan continues to be modified and implemented according to the needs of Branch employees. As a part of the orientation process, all new employees receive an ATIP course, tailored according to their specific role within the Branch. This includes a general overview of the *Access to Information Act*, as well as exposure to all units within the Branch and their responsibilities.

The RCMP implemented a training program for all Intake Unit employees within the Branch to expand their knowledge and awareness of legislated responsibilities regarding the processing of *Access to Information Act* requests. This month-long course provides comprehensive processing training which has proved essential, given the structure and scope of the RCMP and its mandate. During this reporting period, fourteen employees participated in this training program to ensure consistency in the intake process, resulting in the efficient handling of ATIP requests within our Access Pro Case Management system.

The RCMP continues to deliver a three-month training program for Branch Analysts in relation to their responsibilities, including reviewing and applying legislation to responsive records. During this reporting period, eight Junior Analysts and three Senior Analysts successfully completed this comprehensive training; resulting in a 30% increase in reviewing capacity for the Branch without supplemental resources. This activity will continue into fiscal year 2019/2020.

Section 16 of the *Access to Information Act* contains a series of discretionary and mandatory exemptions for law enforcement, investigations and security of penal institutions. Given the RCMP's mandate and responsibilities, it is crucial that ATIP Analysts have a vast knowledge and understanding of Section 16 and its guidelines. A portion of in-house training focuses on providing ATIP Branch employees, including new ATIP Analysts from other government institutions, training sessions on the application of Section 16.

ATIP personnel regularly attend in-house training sessions including those pertaining to Treasury Board Guidelines, as well as those outlining specific exemptions and exclusions under the *Act*. Training sessions and workshops sponsored by the Treasury Board Secretariat and the annual CAPA Conference are well attended by ATIP Analysts which further contributes to their professional development.

In conjunction with the RCMP's training strategy, ATIP employees are encouraged and supported in their professional development for ATIP-related courses as a way to gain knowledge and improve their efficiency as ATIP specialists. The ATIP Branch will formalize its internal processes including the development of standard operating procedures, including the processing and tasking of requests. This project will continue into the next reporting period as processes are streamlined and standardized.

Policies, Guidelines, Procedures and Initiatives

During fiscal year 2018-2019, the RCMP continued to modernize and update all internal policies and procedures to ensure alignment with current reporting standards. These changes will continue to be developed and instituted in the 2019-2020 reporting period, with a particular focus on training at the detachment level to ensure front line employees are knowledgeable of the RCMP's obligations under federal legislation.

To promote transparency in compliance with TBS Guidelines, the RCMP proactively posts monthly summaries of completed Access to Information requests on its website to assist and facilitate the right of access of Canadians. In fiscal year 2018-2019, the RCMP received 444 informal requests for records previously released under the *Access to Information Act* compared to 426 in 2017-2018, an increase of 4%.

Summary of Key Issues and Actions taken on Complaints and Audits

During the 2018-2019 reporting period, the RCMP received a total of 350 new complaints, with a total of 367 complaints against the RCMP closed by the Office of the Information Commissioner of Canada. Of the 367 closed complaints, 28 were unsubstantiated (8%), 66 were well-founded (18%), and 206 were resolved. There were also 64 discontinued complaints (17%) and one complaint was settled in the course of an investigation (0.3%). In many instances, following discussions between the RCMP and the Office of the Information Commissioner of Canada, the RCMP used its discretionary powers to release further information.

During this fiscal year, there were two (2) applications related to the *Access to Information Act* that were submitted to the Federal Court.

During the 2018-2019 reporting period, the Office of the Information Commissioner commenced an investigation into the RCMP ATIP Branch's processes. The investigation is ongoing.

Delegation Order

The Departmental Privacy and Access to Information Coordinator has full authority to administer the legislation and apply exemptions and releases.

A copy of the signed Delegation Order is attached as Appendix A

Chapter Two: Highlights of the Statistical Report

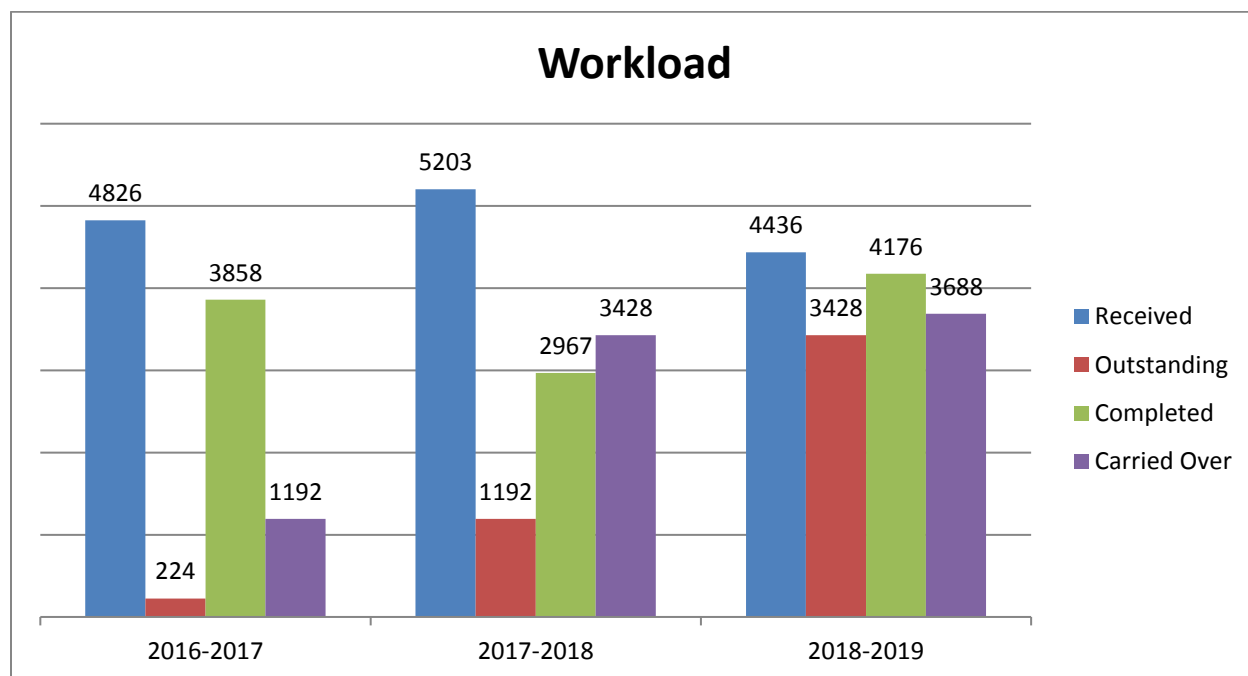
Statistical Report and Supplemental Reporting Requirements

See Appendix B for the RCMP's statistical report on the *Access to Information Act*.

Highlights of the Statistical Report

Requests Received Under the *Access to Information Act*

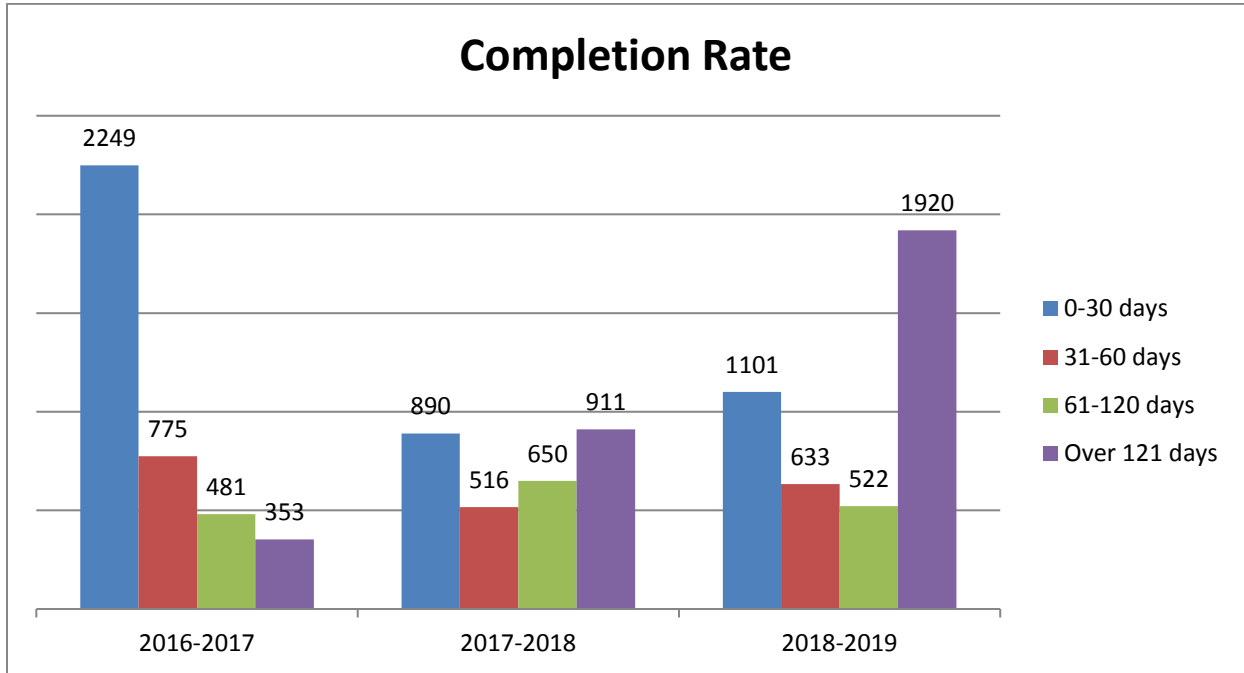
As noted in the statistical report in Appendix B, the RCMP received a total of 4,436 new requests under the *Access to Information Act* in 2018-2019. In addition, there were 3,428 requests outstanding from the previous reporting period for a total of 7,864 requests. Of these, 4,176 requests were completed and 3,688 were carried over to 2019-2020. As evidenced below, there has been a slight decrease in Access to Information requests received compared to the last two reporting periods.



The general nature of Access to Information requests received in the 2018-2019 reporting period covered a variety of topics, including contracts/program costs and expenses, information related to security issues, operational file material as well as the management of the RCMP.

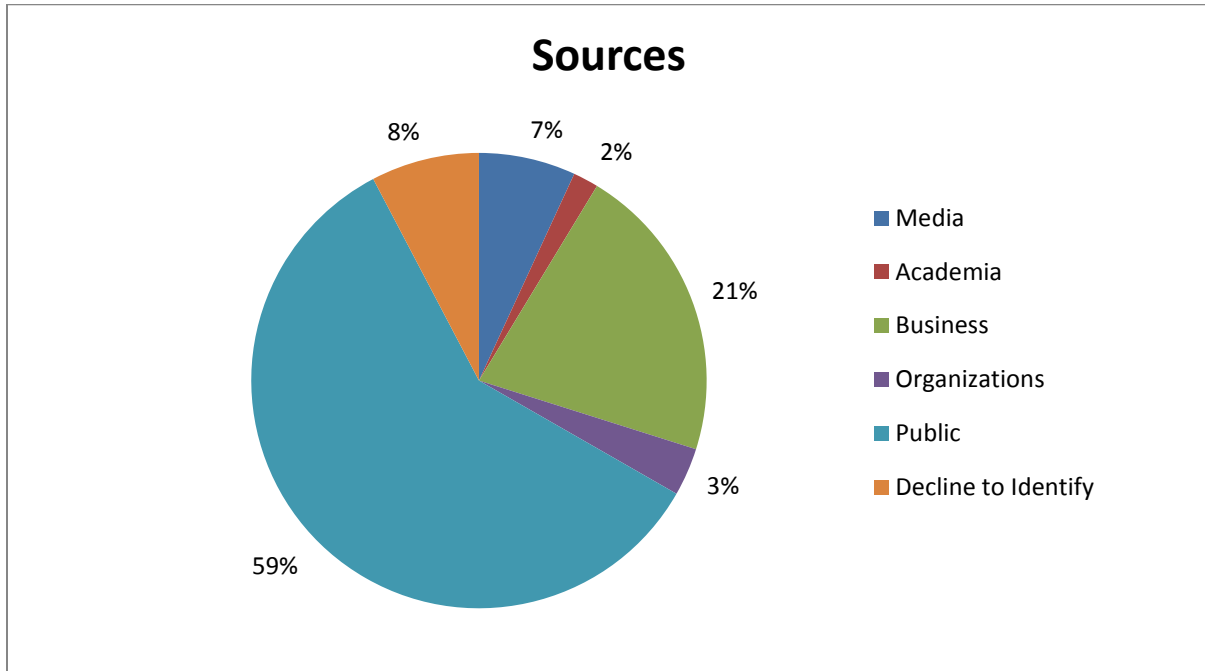
Completion Time

The ATIP Branch was able to complete a total of 1,101 requests in 30 days or less. There were 633 requests completed in 31-60 days, 522 in 61-120 days and 1,920 requests were completed in more than 121 days.



Source of Requests

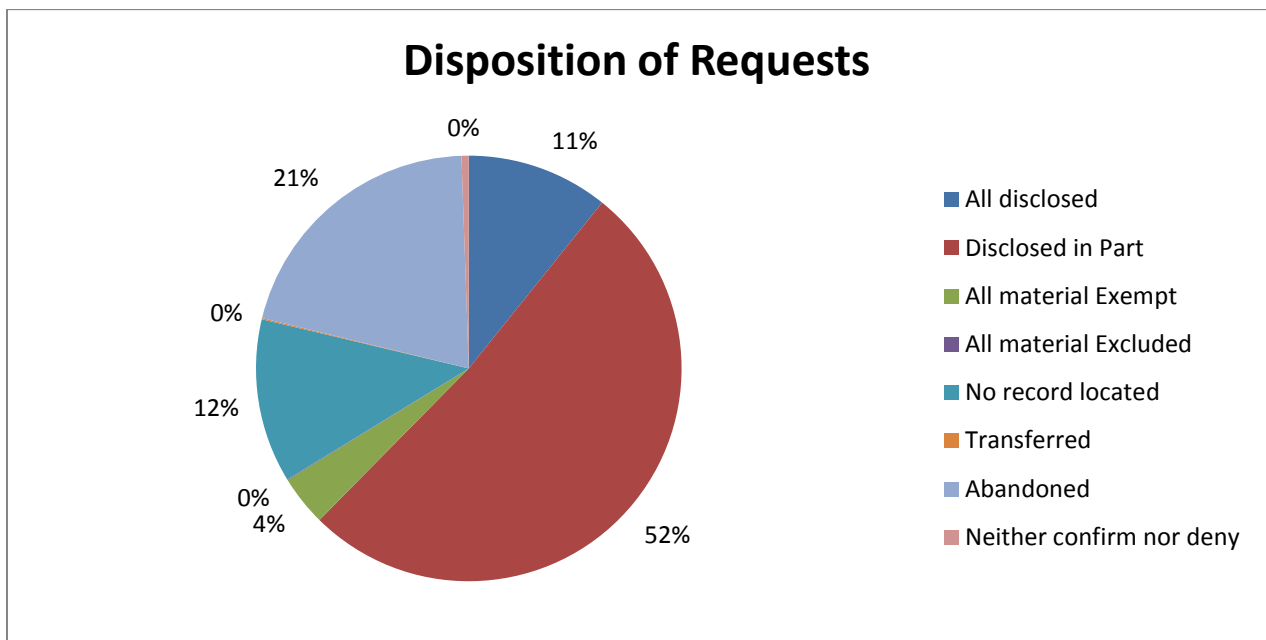
In relation to the sources for requests received, 7% were from the media; 2% from academic sources; 21% from businesses; 3% from organizations; 59% from the public; and 8% from requesters who declined to identify.



Disposition of Completed Requests

Of the 4,176 requests completed in 2018-2019, the dispositions of the completed requests were as follows:

- 450 requests were all disclosed (11%)
- 2,155 requests were disclosed in part (52%)
- 160 requests had all material exempted (4%)
- 2 requests had all material excluded (0%)
- 520 requests had no records located (12%)
- 4 requests were transferred (0%)
- 862 requests were abandoned by the requester (21%)
- 23 requests were neither confirmed nor denied (0%)



Exemptions and Exclusions

As the RCMP is classified as an investigative body under Schedule I of the *Access to Information Act Regulations*, most exemptions listed under the *Access to Information Act* were utilized during the course of the reporting period. The most common exemption applied to records was Section 16, and all of its subsets, for the prevention of disclosure of information used in law enforcement, investigations and security. Other commonly used exemptions were Subsection 19(1), for personal information and Paragraph 13(1)(c), information obtained in confidence from the government of a province or provincial institution. The exclusions invoked under the *Access to Information Act* were under Subsection 68(a) for published material and 69(1) Confidences of the Queen's Privy Council for Canada.

Consultations

During the reporting period, the RCMP completed 535 consultations totalling 334,870 pages. Of the 535 consultations, 431 were received from other Government of Canada Institutions, this is a 5% decrease since the 2017-2018. Moreover, the number of pages received to review from other government institutions increased by 888% compared to the 2017-2018 period. However, it should be noted that one of the consultations received, which consisted of 300,000 pages, was abandoned by the other institution. During the 2018-2019 period, the RCMP initiated a total of 114 consultations with other federal and municipal government institutions and 103 internal consultations.

Complaints and Investigations

The RCMP ATIP Branch received 350 complaints under the *Access to Information Act* during the 2018-2019 fiscal year. The most common *Access to Information Act* complaints received by the RCMP were related to exemption, and deemed refusal complaints. During the reporting period, the RCMP made 11 formal representation complaints pursuant to section 35 of the *Act* and received four (4) 'report of findings with recommendations' from the Information Commissioner pursuant to section 37 of the *Act*. In addition, two (2) applications pursuant to section 42 were submitted to the Federal Court.

Appeals

During this fiscal year, there were no applications related to the *Access to Information Act* submitted to the Federal Court

Conclusion

The achievements outlined in this report demonstrate the RCMP's ongoing commitment to delivering on our institutional obligations and responsibilities under the *Privacy Act*, and to continue improving service standards in 2019-2020. To achieve this goal, the RCMP will further broaden ATIP training functions to enhance employee understanding and responsibilities inherent under the *Act*. Further, functional, procedural and structural changes will be developed and implemented within the ATIP Branch to ensure the RCMP is positioned to meet existing challenges and be more responsive to future demands. These changes will be informed by an internal, risk-based, audit of the ATIP Branch to be completed in June 2019.

Appendix A

Delegation Order

Access to Information Act and Privacy Act Delegation Order

Ordonnance de délégation de pouvoir en vertu de la Loi sur l'accès à l'information et de la Loi sur la protection des renseignements personnels

The Minister of Public Safety and Emergency Preparedness, pursuant to section 73 of the *Access to Information Act* and of the *Privacy Act*, hereby designates the persons holding the position set out in the schedule hereto, or the persons occupying on an acting basis those positions, to exercise the powers and functions of the Minister as the head of a government institution, that is, the Royal Canadian Mounted Police, under the section of the Act set out in the Schedule opposite each position. This designation replaces and nullifies all such designations previously signed and dated by the Minister.

En vertu de l'article 73 de la *Loi sur l'accès à l'information* et de la *Loi sur la protection des renseignements personnels*, le Ministre de la Sécurité publique et de la Protection civile délègue aux titulaires des postes mentionnés à l'annexe ci-après, ou qu'aux personnes occupant à titre intérimaire lesdits postes, les attributions dont il est, en qualité de responsable d'une institution fédérale, c'est-à-dire, la Gendarmerie royale du Canada, investi par les articles de la Loi mentionnés en regard de chaque poste. Le présent document remplace celui précédemment signé par le ministre.

SCHEDULE/ANNEXE

Position/Poste	<i>Privacy Act and Regulations/ Loi sur la protection des renseignements personnels et règlements</i>	<i>Access to information Act and Regulations/ Loi sur l'accès à l'information et règlements</i>
Commissioner of the RCMP / Commissaire de la GRC Chief, Strategic Policy and Planning Officer / Dirigeante principale de la planification et des politiques stratégiques Departmental Access to Information and Privacy Coordinator / Coordonnateur ministériel de l'accès à l'information et de la protection des renseignements personnels	Full Authority / Autorité absolue	Full Authority / Autorité absolue
Commanding Officers / Commandants Divisionnaires	Authority for 8(2)(j) and 8(2)(m)/ Autorité pour 8(2)(j) et 8(2)(m)	N.A./s.o.

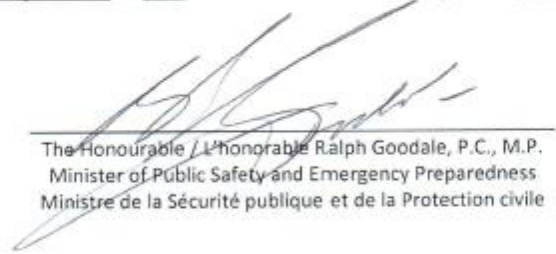
<p>Officer in Charge, Policy, Processing and External Relations / Officier responsable des politiques, traitement et relations externes</p> <p>Manager, Processing and Triage / Responsable, Groupe de traitement et triage</p> <p>Manager, Quality Control / Gestionnaire, contrôle de la qualité</p> <p>Non-Commissioned Officers and public servants in charge of ATIP unit / Sous-officiers et fonctionnaires responsables des unités de l'AIPRP</p>	<p>Full Authority except 8(2)(j) and 8(2)(m) / Autorité absolue à l'exception de 8(2)(j) et 8(2)(m)</p>	<p>7, 8(1), 9, 11(2) to 11(6) (inclusive), 12(2) and all mandatory exemptions (13(1), 16(3), 19(1), 20(1) and 24(1)) and 6(1) and 8 of the Regulations / 7, 8(1), 9, 11(2) à 11(6) (inclusivement), 12(2) et toutes les exceptions obligatoires (13(1), 16(3), 19(1), 20(1) et 24(1)) de la Loi, et 6(1) and 8 du règlements</p>
<p>Non-commissioned officers and public servants in charge of ATIP branch (analysts) / Sous-officiers et fonctionnaires responsables au sein des unités de l'AIPRP (réviseurs)</p>	<p>14 and 15 for all records; 17(2)(b), 19 to 28 (inclusive) for all employee records as designated in InfoSource; For all other records requiring mandatory exemptions in their entirety (19(1), 22(2) and 26) of the Act; 9 and 11(2) of the Regulations / 14 et 15 pour tous les dossiers; 17(2)(b), 19 à 28 (inclusivement) pour tous les dossier d'employés tels que désigné dans InfoSource; pour tous les dossiers nécessitant des exceptions obligatoires en entier (19(1), 22(2) et 26) de la Loi; 9 et 11(2) du règlements</p>	<p>7, 8(1) and 12(2)(b) and all records exempted in their entirety by mandatory exemptions (13(1), 16(3), 19(1), 20(1) and 24(1)) of the Act; 6(1) and 8 of the Regulations / 7, 8(1) et 12(2)(b) pour tous les dossiers nécessitant des exceptions obligatoires en entier (13(1), 16(3), 19(1), 20(1) and 24(1)) de la Loi; 6(1) et 8 du règlements</p>

Signed, at the City of Ottawa, this

Signé, à Ottawa, ce

4 day of Dec, 2015

jour de _____, 20____



The Honourable / L'honorable Ralph Goodale, P.C., M.P.
 Minister of Public Safety and Emergency Preparedness
 Ministre de la Sécurité publique et de la Protection civile

Appendix B

Statistical Report on the *Access to Information Act*



Statistical Report on the Access to Information Act

Name of institution: Royal Canadian Mounted Police

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

Part 1: Requests Under the Access to Information Act

1.1 Number of requests

	Number of Requests
Received during reporting period	4436
Outstanding from previous reporting period	3428
Total	7864
Closed during reporting period	4176
Carried over to next reporting period	3688

1.2 Sources of requests

Source	Number of Requests
Media	305
Academia	80
Business (private sector)	940
Organization	152
Public	2618
Decline to Identify	341
Total	4436

1.3 Informal 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	
289	82	45	17	10	0	1	444

Note: All requests previously recorded as “treated informally” will now be accounted for in this section only.

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	14	60	66	84	40	103	83	450
Disclosed in part	68	284	278	243	160	666	456	2155
All exempted	6	32	32	25	15	30	20	160
All excluded	0	0	0	0	0	0	2	2
No records exist	76	84	142	97	24	68	29	520
Request transferred	4	0	0	0	0	0	0	4
Request abandoned	375	95	114	69	33	69	107	862
Neither confirmed nor denied	2	1	1	4	1	6	8	23
Total	545	556	633	522	273	942	705	4176

2.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
13(1)(a)	33	16(2)	110	18(a)	1	20.1	0
13(1)(b)	11	16(2)(a)	9	18(b)	0	20.2	0
13(1)(c)	302	16(2)(b)	2	18(c)	0	20.4	0
13(1)(d)	101	16(2)(c)	11	18(d)	0	21(1)(a)	28
13(1)(e)	0	16(3)	0	18.1(1)(a)	0	21(1)(b)	22
14	3	16.1(1)(a)	0	18.1(1)(b)	0	21(1)(c)	4
14(a)	4	16.1(1)(b)	1	18.1(1)(c)	0	21(1)(d)	6
14(b)	0	16.1(1)(c)	5	18.1(1)(d)	0	22	18
15(1)	17	16.1(1)(d)	0	19(1)	1630	22.1(1)	1
15(1) - I.A.*	2	16.2(1)	0	20(1)(a)	1	23	56
15(1) - Def.*	1	16.3	0	20(1)(b)	3	24(1)	4
15(1) - S.A.*	6	16.4(1)(a)	0	20(1)(b.1)	0	26	17
16(1)(a)(i)	425	16.4(1)(b)	0	20(1)(c)	15		
16(1)(a)(ii)	196	16.5	0	20(1)(d)	8		
16(1)(a)(iii)	1	17	5				
16(1)(b)	122						
16(1)(c)	288						
16(1)(d)	0						

* I.A.: International Affairs Def.: Defence of Canada S.A.: Subversive Activities

2.3 Exclusions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
68(a)	3	69(1)	0	69(1)(g) re (a)	0
68(b)	0	69(1)(a)	3	69(1)(g) re (b)	0
68(c)	0	69(1)(b)	0	69(1)(g) re (c)	0
68.1	0	69(1)(c)	0	69(1)(g) re (d)	0
68.2(a)	0	69(1)(d)	0	69(1)(g) re (e)	0
68.2(b)	0	69(1)(e)	1	69(1)(g) re (f)	0
		69(1)(f)	0	69.1(1)	0

2.4 Format of information released

Disposition	Paper	Electronic	Other Formats
All disclosed	317	127	6
Disclosed in part	1035	1115	5
Total	1352	1242	11

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	133778	32791	450
Disclosed in part	409048	249674	2155
All exempted	75848	0	160
All excluded	2332	0	2
Request abandoned	57297	0	862
Neither confirmed nor denied	0	0	23

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	4180	3724	20	3385	6	3588	4	4020	2	18074
Disclosed in part	1696	28026	313	36453	77	32923	65	68050	4	84222
All exempted	109	0	370	0	7	0	3	0	4	0
All excluded	0	0	1	0	0	0	1	0	0	0
Request abandoned	813	0	30	0	5	0	12	0	2	0
Neither confirmed nor denied	23	0	0	0	0	0	0	0	0	0
Total	6821	31750	734	39838	95	36511	85	72070	12	102296

2.5.3 Other complexities

Disposition	Consultation Required	Assessment of Fees	Legal Advice Sought	Other	Total
All disclosed	6	0	0	125	131
Disclosed in part	57	1	1	162	221
All exempted	1	0	0	9	10
All excluded	0	0	0	0	0
Request abandoned	1	0	0	9	10
Neither confirmed nor	0	0	0	1	1
Total	65	1	1	306	373

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
2979	2746	33	35	165

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	339	17	356
16 to 30 days	240	6	246
31 to 60 days	275	13	288
61 to 120 days	309	21	330
121 to 180 days	260	8	268
181 to 365 days	863	13	876
More than 365 days	582	33	615
Total	2868	111	2979

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: Extensions

3.1 Reasons for extensions and disposition of requests

Disposition of Requests Where an Extension Was Taken	9(1)(a) Interference With Operations	9(1)(b) Consultation		9(1)(c) Third-Party Notice
		Section 69	Other	
All disclosed	16	0	9	0
Disclosed in part	92	0	16	2
All exempted	10	0	3	0
All excluded	0	0	0	0
No records exist	4	0	0	0
Request abandoned	14	0	1	0
Total	136	0	29	2

3.2 Length of extensions

Length of Extensions	9(1)(a) Interference With Operations	9(1)(b) Consultation		9(1)(c) Third-Party Notice
		Section 69	Other	
30 days or less	31	0	13	1
31 to 60 days	72	0	8	1
61 to 120 days	22	0	6	0
121 to 180 days	7	0	2	0
181 to 365 days	4	0	0	0
365 days or more	0	0	0	0
Total	136	0	29	2

Part 4: Fees

Fee Type	Fee Collected		Fee Waived or Refunded	
	Number of Requests	Amount	Number of Requests	Amount
Application	4314	\$21,570	122	\$610
Search	0	\$0	0	\$0
Production	0	\$0	0	\$0
Programming	0	\$0	0	\$0
Preparation	0	\$0	0	\$0
Alternative format	0	\$0	0	\$0
Reproduction	0	\$0	0	\$0
Total	4314	\$21,570	122	\$610

Part 5: Consultations Received From Other Institutions and Organizations

5.1 Consultations received from other Government of Canada institutions and organizations

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during reporting period	430	30762	104	4108
Outstanding from the previous reporting period	104	10702	3	176
Total	534	41464	107	4284
Closed during the reporting period	446	33318	96	3016
Pending at the end of the reporting period	88	8146	11	1268

5.2 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	
Disclose entirely	78	56	77	34	3	9	2	259
Disclose in part	12	21	51	42	16	18	4	164
Exempt entirely	4	0	2	1	2	0	0	9
Exclude entirely	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	5	1	5	0	2	0	1	14
Total	99	78	135	77	23	27	7	446

5.3 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	
Disclose entirely	27	23	13	7	0	1	1	72
Disclose in part	6	3	5	1	0	1	0	16
Exempt entirely	1	2	1	0	2	0	0	6
Exclude entirely	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	1	1	0	0	0	0	2
Total	34	29	20	8	2	2	1	96

Part 6: Completion Time of Consultations on Cabinet Confidences

6.1 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	1	696	0	0	0	0
16 to 30	3	0	0	0	0	0	0	0	0	0
31 to 60	1	70	0	0	0	0	0	0	0	0
61 to 120	1	2	0	0	0	0	0	0	0	0
121 to 180	1	1	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	6	73	0	0	1	696	0	0	0	0

6.2 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	1	0	0	0	0	0	0	0
16 to 30	3	7	0	0	0	0	0	0	0	0
31 to 60	1	4	0	0	0	0	0	0	0	0
61 to 120	1	70	0	0	0	0	0	0	0	0
121 to 180	1	2	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	6	83	1	0	0	0	0	0	0	0

Part 7: Complaints and Investigations

Section 32	Section 35	Section 37	Total
350	11	4	365

Part 8: Court Action

Section 41	Section 42	Section 44	Total
0	2	0	2

Part 9: Resources Related to the *Access to Information Act*

9.1 Costs

Expenditures		Amount
Salaries		\$2,619,382
Overtime		\$75,363
Goods and Services		\$283,340
• Professional services contracts	\$117,247	
• Other	\$166,093	
Total		\$2,978,085

9.2 Human Resources

Resources	Person Years Dedicated to Access to Information Activities
Full-time employees	31.00
Part-time and casual employees	3.00
Regional staff	0.00
Consultants and agency personnel	2.50
Students	0.50
Total	37.00

Note: Enter values to two decimal places.

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Chapter Three: *Privacy Act* Report

Introduction

The 2018-2019 Annual Report on the administration of the *Privacy Act* details the manner in which the Royal Canadian Mounted Police discharged its responsibilities in relation to the *Act*, during fiscal year 2018-2019.

The *Privacy Act* extends to individuals, the right of access to information about themselves held by the government, subject to specific and limited exceptions. The *Privacy Act* also protects individuals' privacy by preventing others from having access to their personal information and gives individuals substantial control over its collection, retention, use and disclosure.

Section 72(1) of the *Privacy Act* requires that the head of every government institution prepare, for submission to Parliament, an Annual Report on the administration of the *Act* within the institution during each financial year.

In fiscal year 2018-2019, the RCMP continued to establish new procedures and practices in order to ensure the sustained provision of timely service to Canadians who seek to exercise their right to access records under the *Privacy Act*.

Organization

About the Royal Canadian Mounted Police

The Royal Canadian Mounted Police is Canada's national police force. As a federal, provincial and municipal policing organization, the RCMP provides federal policing services to all Canadians and policing services under contract to the three territories, eight provinces, and more than 180 municipalities, 600 Aboriginal communities and three international airports.

The RCMP is governed by the *Royal Canadian Mounted Police Act*. In accordance with the *Act*, it is headed by a Commissioner who, under the direction of the Minister of Public Safety, has control and management of the Force.

The organization is sub-divided into 15 Divisions, and a National Headquarters in Ottawa, each of which is under the direction of a Commanding Officer. Nationally, there are more than 750 detachments across Canadian communities.

The RCMP is structured by business line, as follows: Federal Policing; Contract and Indigenous Policing; Specialized Policing Services; Corporate Management; Human Resources; Internal Audit and Evaluation; Legal Services; Office of the Ethics Advisor; and, Strategic Policy and Planning Directorate. Business lines are guided by strategic priorities that are reviewed periodically to ensure both operational and organizational efforts are aligned and focussed on maintaining a safe and secure Canada. The strategic priorities are: Serious and Organized

Crime; National Security, Youth, Indigenous Communities and Economic Integrity. Additionally, wherever possible, these priorities are supported by partnerships and integrated policing efforts.

The RCMP's scope of operations include: crime prevention, community safety, victim services, combating terrorism, organized crime, and specific crimes related to the illicit drug trade; cybercrime and economic crime such as counterfeiting and credit card fraud; and offences that threaten the integrity of Canada's national borders. The RCMP protects VIPs, including the Prime Minister and foreign dignitaries and provides the law enforcement community with a full range of specialized policing services as well as international peacekeeping.

As the RCMP approaches its 150th anniversary in 2023, it is undergoing a period of transformation with the vision of becoming an even more trusted and inclusive organization that is accountable and committed to its employees, its partners, and the communities it serves. This vision sets out its goals for modernization with a focus on its people, its culture, its stewardship, and its policing services.

Access to Information and Privacy Branch

The RCMP established the Access to Information and Privacy Branch in 1983, as the central contact point for matters arising from both the *Access to Information* and *Privacy Acts*.

The Access to Information and Privacy (ATIP) Coordinator acts on behalf of the head of the Institution as the Departmental Access to Information and Privacy Coordinator for the RCMP. The ATIP Coordinator ensures compliance with both the spirit and the intent of the *Privacy Act*, as well as associated regulations and guidelines.

The Access to Information and Privacy program is divided into two major areas:

- **Disclosure:** processes all formal requests under the *Access to Information Act*; and
- **Compliance:** monitors and develops internal policies, procedures and guidelines for the collection, retention, disposition, use and disclosure of all personal and non-personal information for Force-wide application, offers support to ATIP reviewers and ATIP Officer in Charge, provides guidance to the Divisions with respect to section 4 to 8 of the *Privacy Act*, reviews and creates policies that reflect Treasury Board Secretariat Policies and Directives and the Office of the Privacy Commissioner expectations in order to meet its obligations in relation to the Info Source, Annual reports, Privacy Impact Assessments and internal training within the RCMP.

The RCMP ATIP Branch also accommodates requests for informal access to records. Appointments can be arranged for individuals who wish to review records related to *Privacy Act* requests or public documents of the RCMP, either at the Divisional level or at RCMP Headquarters in Ottawa. ¹

¹ To schedule an appointment, individuals may contact 1-855-629-5877. The public may access additional information about the RCMP at: <http://www.rcmp-grc.gc.ca>

Activities and Accomplishments

The RCMP remains an active participant in the support and promotion of access to information. In April 2014, the RCMP joined the Access to Information and Privacy Online Request service, which allows Canadians to submit and pay for requests online. The number of requests received by the RCMP through the online portal has increased over the past several years. During fiscal year 2014-2015, the percentage of requests received through the online portal was 51%. While the percentage rose to 61% in 2015-2016 and 64% in 2016-2017, requests declined to 55.3% in 2017-18. In 2018-2019, however, the percentage increased to 62%.

During the 2018-2019 fiscal year, the RCMP undertook the following initiatives to improve internal processes and client service under the *Privacy Act*:

- Provided ATIP information sessions to RCMP employees in locations across Canada to impart a clear understanding of employee roles and responsibilities;
- Provided training to all new RCMP ATIP employees to ensure a consistent approach with respect to learning the legislation and internal processes;
- Increased ATIP employee knowledge by providing in-house training to further improve service standards;
- Held engagement meetings with numerous internal stakeholders and other federal government departments to improve dialogue and accountability;
- Implemented a Triage Unit to clarify and assist requesters in obtaining responsive records;
- Ongoing modernization of processing procedures to ensure efficiencies in the time it takes to process incoming requests;
- Hired ATIP consultants to address the backlog of files;
- Implemented strategies to streamline data importation processes which resolved the backlog of approximately 800,000 pages, 1,400 CDs, 45 audio cassettes and 1,500 microfiches;
- In preparation for the modernization of the *Privacy Act*, the ATIP Branch participated in several interdepartmental Working Groups hosted by the Department of Justice and provided internal briefings to ensure the RCMP is prepared to address upcoming requirements.

Performance

To monitor performance under the *Act*, the compliance rate is calculated as a percentage of the number of requests processed and completed within allotted time limits over the total number of requests. The RCMP monitors compliance through weekly updates to the Chief Strategic Policy and Planning Officer of the RCMP.

During the 2018-2019 reporting period, the RCMP's compliance rate was 40.9% compared to 45.1%, for the previous reporting period. This reduction can be attributed in part to an increase in the volume of requests received during the previous reporting period, which saw 4,009 files carried over into this fiscal year, including 4,289 new requests. The number of requests decreased by 14.1%. The decline in *Privacy Act* requests may also be reflective, in part, to

internal requests for administrative files, which decreased the number of formal requests received.

As the national institution responsible for the prevention and investigation of a broad range of criminality, spanning street level drug enforcement to violent crimes, to national security and terrorism offences, the RCMP's high-risk operating environment is both critically sensitive and exceedingly complex. Accordingly, RCMP ATIP Analysts recognize the potential impacts of the inadvertent release of investigative and intelligence information, and the need to apply rigor and diligent review of information, which impacts response times.

The RCMP's Policy Unit responded to over 907 policy related queries from detachments across Canada on various topics including the interpretation of section 4 to 8 of the *Privacy Act*, Privacy Impact Statements and Info Source. During fiscal year 2018-2019, the percentage of policy related queries rose by approximately 19%.

Human Resources

The RCMP ATIP Branch has a total of 77 funded positions, all of which are fully committed to the administration of the *Access to Information Act*.

In an effort to ensure information is disclosed in a manner that does not compromise public safety / law enforcement personnel or undermine ongoing investigations, law enforcement techniques or resulting judicial processes, nearly one quarter of all ATIP Analyst positions are filled with experienced police officers, from a range of enforcement programs. This model helps reduce the need for lengthy consultations with program managers concerning Access to Information Act requests and preserves credibility with the law enforcement community, international agencies and other federal departments and information sources.

Recruiting, hiring and retaining individuals who possess the necessary skills and experience for the Access to Information and Privacy discipline is a formidable challenge confronting all federal institutions. As a result, the market for ATIP analysts is extremely competitive. The RCMP continues to work on innovative recruitment and retention strategies, while ensuring compliance rates improve. The RCMP has also successfully hired an ATIP employee through WorkLivePlay, a Canadian charitable organization that supports people with intellectual disabilities.

The provision of internal development opportunities within the Branch allows employees to acquire and/or further their knowledge, skills and experience in Access to Information and Personal Information. Another source of assistance for the ATIP Branch is the Federal Student Work Experience Program (FSWEP), which offers the possibility of employment within the Federal Public Service at the cessation of their term. During this reporting period, the RCMP ATIP Branch bridged two students to full time employees.

Education and Awareness

The RCMP recognizes that every employee has a role to play in making government information accessible to Canadians. During this reporting period, nearly 1200 employees across the country, attended information sessions delivered by the ATIP Training Unit to become familiar with the *Access to Information Act* and their responsibilities with the ATIP process.

The ATIP Training Plan continues to be modified and implemented according to the needs of Branch employees. As a part of the orientation process, all new employees receive an ATIP course, tailored according to their specific role within the Branch. This includes a general overview of the *Access to Information Act*, as well as exposure to all units within the Branch and their responsibilities.

The RCMP implemented a training program for all Intake Unit employees within the Branch to expand their knowledge and awareness of legislated responsibilities regarding the processing of *Access to Information Act* requests. This month-long course provides comprehensive processing training which has proved essential, given the structure and scope of the RCMP and its mandate. During this reporting period, fourteen employees participated in this training program to ensure consistency in the intake process, resulting in the efficient handling of ATIP requests within our Access Pro Case Management system.

The RCMP continues to deliver a three-month training program for Branch Analysts in relation to their responsibilities, including reviewing and applying legislation to responsive records. During this reporting period, eight Junior Analysts and three Senior Analysts successfully completed this comprehensive training; resulting in a 30% increase in reviewing capacity for the Branch without supplemental resources. This activity will continue into fiscal year 2019/2020.

Section 22 of the *Privacy Act* contains a series of discretionary and mandatory exemptions for law enforcement, investigations and security of penal institutions. Given the RCMP's mandate and responsibilities, it is crucial that ATIP Analysts have a vast knowledge and understanding of Section 22 and its guidelines. A portion of in-house training focuses on providing ATIP Branch employees, including new ATIP Analysts from other government institutions, training sessions on the application of Section 22.

ATIP personnel regularly attend in-house training sessions including those pertaining to Treasury Board Guidelines, as well as those outlining specific exemptions and exclusions under the *Act*. Training sessions and workshops sponsored by the Treasury Board Secretariat and the annual CAPA Conference are well attended by ATIP Analysts which further contributes to their professional development.

In conjunction with the RCMP's training strategy, ATIP employees are encouraged and supported in their professional development for ATIP-related courses as a way to gain knowledge and improve their efficiency as ATIP specialists. The ATIP Branch will formalize its internal processes including the development of standard operating procedures, including the processing and tasking of requests. This project will continue into the next reporting period as processes are streamlined and standardized.

New and Revised Privacy-related Policies and Procedures

Throughout fiscal year 2018-2019, the RCMP continued to modernize and update all internal policies and procedures to ensure alignment with current reporting standards. These changes will continue to be developed and instituted in the 2019-2020 reporting period, with a particular focus on training at the detachment level to ensure front line employees are knowledgeable of the RCMP's obligations under federal legislation.

During the course of this reporting period, ATIP Branch discovered that attempts to access personal information fraudulently through the Access to Information and Privacy Online Request service were occurring. Consequently, applicants are now required to provide a signature and photo identification when submitting a request. This new requirement may account for the decrease in the number of requests received compared to the previous reporting period.

The ATIP Policy Unit provided RCMP Offices of Primary Interest (OPIs) with a simplified Privacy Impact Assessment (PIA) template, updated and clarified the PIA submission process, and amalgamated internal policies regarding disclosures, in accordance with paragraph 8(2) of the *Privacy Act*. To facilitate searching capabilities and clarify both the PIA process and privacy breach procedures, ATIP Branch updated its internal web page, including the coordination of modifications.

Privacy Impact Assessments

During the reporting period, the RCMP completed two Privacy Impact Assessments (PIAs). The National DNA Data Bank (NDDDB) PIA was submitted to both the Treasury Board Secretariat (TBS) and the Office of the Privacy Commissioner (OPC). This program was the subject of a PIA in 2014 and was updated as a result of amendments to the *DNA Identification Act*. The Remotely Piloted Aircraft System (RPAS) Program PIA was submitted to the OPC, as no change to the related Personal Information Bank (PIB) was required. A short description of each PIA is listed below. The complete Executive Summaries for these programs can be found on the RCMP website at the following link: <http://www.rcmp-gc.ca/pia-efvp/index-eng.htm>

In addition, nine PIAs (two of which have been finalized) and three PIA addenda were carried forward from last fiscal year. All Privacy Impact Assessments were subject to multiple reviews by the RCMP ATIP Branch, with seven pending completion by the Offices of Primary Interest. Six new PIAs were submitted to the RCMP ATIP Branch during the 18/19 fiscal year. Three out of the six new PIAs were subject to a first review by the RCMP ATIP Branch. Over 200 PIA-related queries were responded to, and 33 Questionnaires were reviewed to determine the need for a PIA.

[National DNA Data Bank](#)

The National DNA Data Bank (NDDDB) is used to identify, link and investigate individuals involved in designated offences, and to assist in the investigation of missing persons and unidentified human remains through DNA. It is administered by the Royal Canadian Mounted

Police (RCMP) Forensic Science and Identification Services (FS&IS), and operates under the stewardship of the RCMP's National Police Services (NPS) program. The NDDDB was established in June 2000 through the enactment of the *DNA Identification Act*. It is Canada's only comprehensive database for the recording and rapid retrieval of DNA profiles related to designated offences, and is used by law enforcement officials across Canada to assist in criminal investigations.

In December 2014, the *DNA Identification Act* was amended to expand the NDDDB and the use of DNA analysis by the RCMP to assist in the investigation of missing persons and unidentified human remains. These amendments came into force on March 6, 2018. Under the amended *Act*, the NDDDB was expanded to create five new DNA indices: Relatives of Missing Person Index (RMI), Missing Persons Index (MPI), Human Remains Index (HRI), Victims Index (VI), and the Voluntary Donors Index (VDI).

[Remotely Piloted Aircraft System \(RPAS\) Program](#)

The Remotely Piloted Aircraft System (RPAS) Program is used by the RCMP to capture aerial images and videos in support of RCMP operations. A RPAS is a power-driven aircraft where its components, such as a camera, are operated without a flight crew member on board. It is also commonly referred to as a drone, Small Unmanned Aircraft (SUA), Unmanned Aerial Vehicle (UAV), and Unmanned Aerial System (UAS). The RCMP currently operates several different systems that carry both still and video cameras, infrared cameras or thermal imagery. When in operation, the RPAS is flown by a pilot remotely, while a payload operator is responsible to capture any images and video.

Disclosures made pursuant to paragraph 8(2)(m) of the Privacy Act

During the 2018-2019 fiscal year, 32 disclosures were made pursuant to paragraph 8(2)(m) of the *Privacy Act*. The disclosures were related to either the duty status of charged RCMP members or the release of dangerous offenders into communities across Canada. In many cases, the RCMP notified to the Office of the Privacy Commissioner (OPC) prior to the disclosure.

Complaints and Audits

The ATIP Branch received 184 complaints under the *Privacy Act* during 2018-2019. The most common complaints under the *Privacy Act* received by the RCMP were exemption related and deemed refusal complaints. The RCMP made no formal representations pursuant to section 33 and received no 'reports of findings' with recommendations from the Privacy Commissioner pursuant to section 35.

In fiscal year 2018-2019, the RCMP received 22 findings from the OPC in relation to privacy compliance complaints. Of the 22 complaints, five were well-founded, 11 were not substantiated, two were resolved and four were discontinued. There were no notable

investigations of the RCMP conducted by the OPC. The majority of investigations were related to non-respect of internal policies and human error.

Privacy Breaches

There were five material privacy breaches reported to the OPC and the Privacy Policy Division, Treasury Board of Canada Secretariat during the 2018-2019 fiscal year. In two cases, following a review of the breaches and the measures taken by the RCMP, the OPC decided not to pursue the matter further. The remaining three breaches are still being reviewed by the OPC. Below is a brief description of the breaches and actions taken:

In the first case, an RCMP employee inappropriately accessed police files, outside the scope of their work duties, contravening the acceptable user practices for RCMP information technology. The matter was investigated and disciplinary action was taken.

In the second case, following an informal request for access to a medical file, an RCMP member received an unredacted which contained personal medical information of other members. The individuals affected were notified of the breach. Training was provided to Occupational Health Services employees on vetting and disclosure to prevent a re-occurrence. Additionally, the unit created and implemented standard operating procedures for informal disclosure of files.

In the third case, an RCMP member inappropriately disclosed an un-redacted police occurrence narrative report to support his complaint against an employee of a provincial institution. The narrative included the name of the employee and one other individual (affected individual) involved in the occurrence. The matter was investigated, the employee underwent mandatory training in the area of disclosure and reviewed policy with respect to Access to Information and Privacy.

In the fourth case, a number of envelopes being prepared for mailing within the RCMP's Canadian Firearms Program (CFP) Processing Centre did not seal properly after being processed through a mailing machine. It was believed that the machine's dampening pads failed during regular operation. All mail was addressed to various clients of the CFP located across Canada and may have contained their firearms license card or a written notice requesting them to contact the CFP with more information. The CFP was notified by three clients that they received an unsealed envelope however it is not known if any information was breached. Given the volume of individuals potentially affected, this incident was reported to the OPC. The mechanical issues have been resolved, with ongoing monitoring to ensure proper functioning.

In the fifth incident, an email intended for an RCMP member which contained their sensitive, personal information, was inadvertently sent to an incorrect personal email address. An email was immediately sent to the unintended recipient requesting that they delete the message from their inbox. To date, the RCMP has not heard back from this individual but will update the OPC if confirmation is received.

Delegation Order

See Appendix C for a signed copy of the Delegation Order.

Chapter Four: Interpretation of the Statistical Report

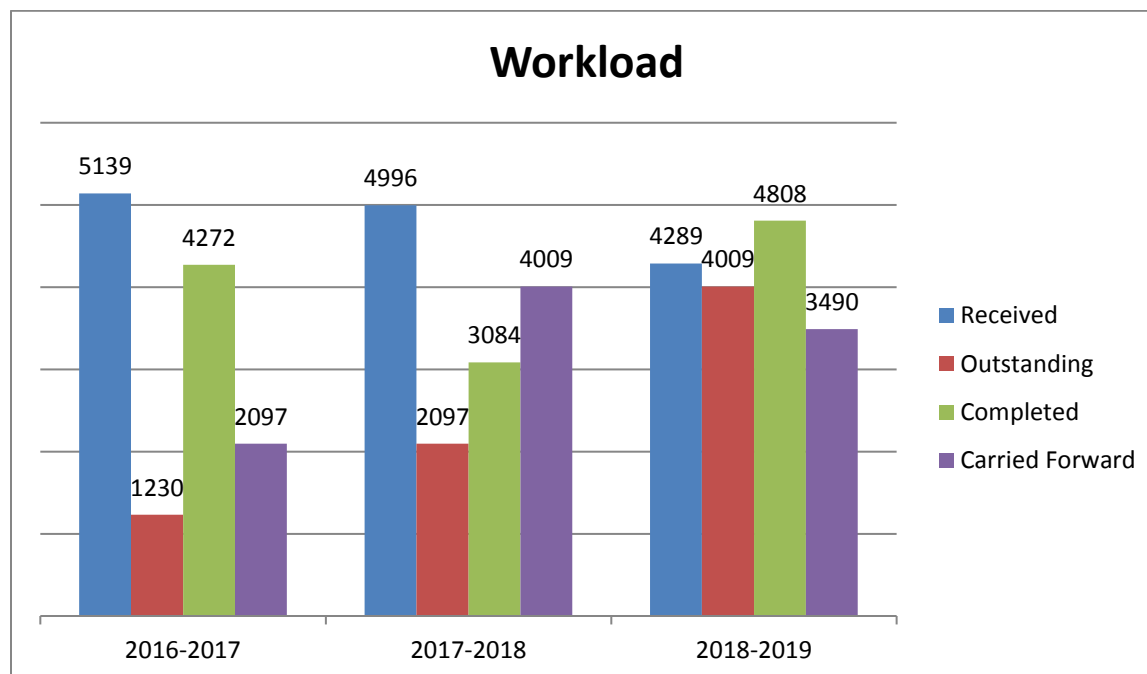
Statistical Report and Supplemental Reporting Requirements

See Appendix D for the RCMP's statistical report on the *Privacy Act*.

Interpretation of the Statistical Report

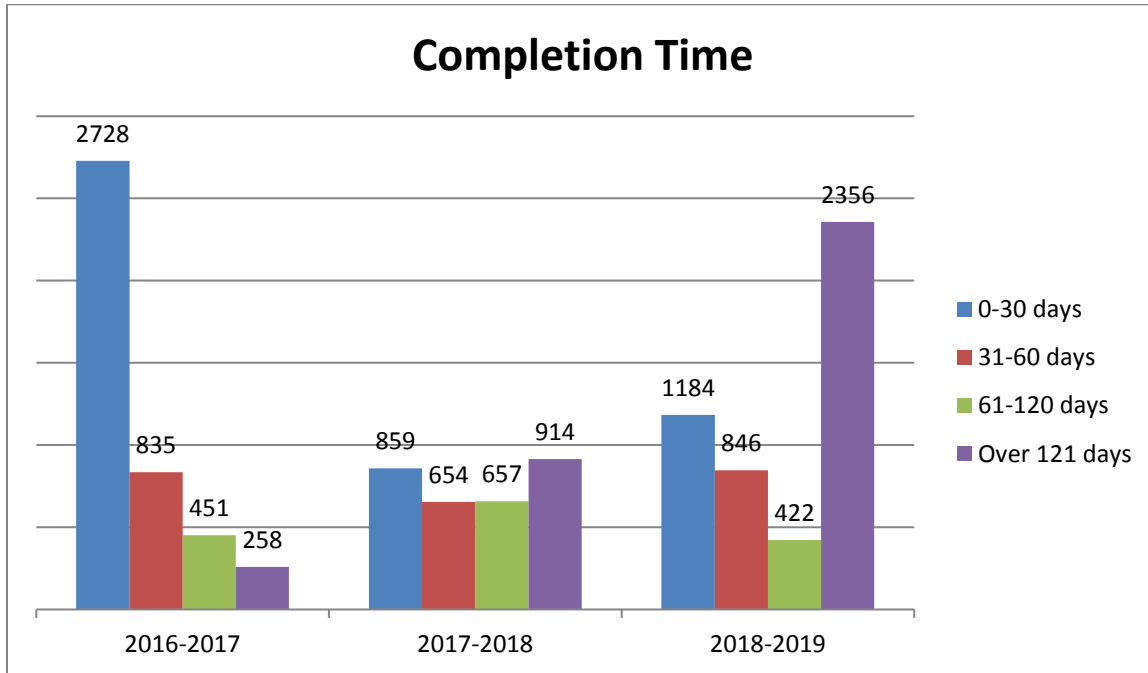
Requests Received Under the *Privacy Act*

As noted in the statistical report in Appendix D, the RCMP received a total of 4,289 new requests under the *Privacy Act*. In addition, there were 4,009 requests outstanding from the previous reporting period for a total of 8,298 requests. Of these, 4,808 requests were completed and 3,490 were carried over to the next reporting period. As evidenced below, there has been a slight decrease in privacy requests received compared to the last two previous reporting periods.



Completion Time

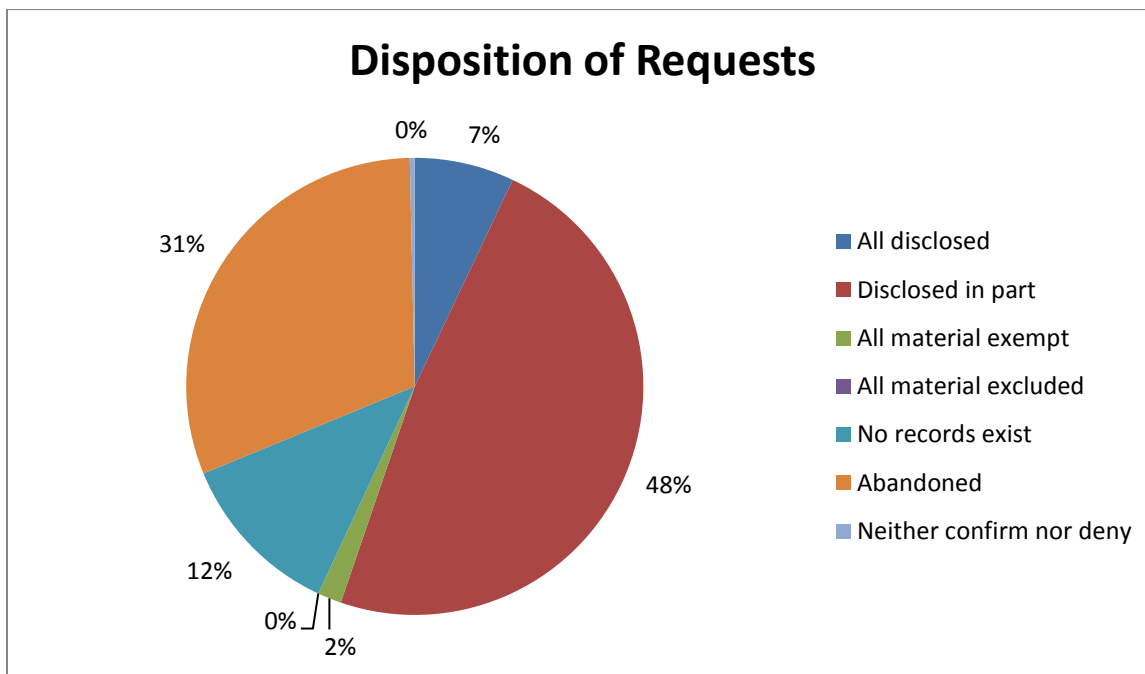
The ATIP Branch completed a total of 1184 requests in 30 days or less. There were 846 requests completed in 31-60 days, 422 in 61-120 days and 2356 requests were completed in more than 121 days. Extensions of 30 days were sought on 3053 files.



Disposition of Requests Completed

Of the 4,808 requests completed in 2018-2019, the disposition of completed requests and their relative percentage to all requests received are as follows:

- 339 requests were all disclosed (7%)
- 2317 requests were disclosed in part (48%)
- 81 requests had all material exempted (2%)
- 0 requests had all material excluded (0%)
- 570 requests had no records exist (12%)
- 1484 requests were abandoned by the requester (31%)
- 17 requests were neither confirmed nor denied (0.3%)



Exemptions and Exclusions

As the RCMP is classified as an investigative body under Schedule II of the *Privacy Act* Regulations, most exemptions listed under the *Privacy Act* were used during the course of this reporting period. The most common exemption applied to records was Section 26 as personal information belonging to another individual. Other common exemptions applied were Subsection 22(1), for information used in law enforcement, investigations and security and Subsection 19(1), for personal information obtained in confidence from the government of a province or municipality.

Consultations

During the reporting period, the RCMP completed 150 consultations totalling 6,235 pages. Of the 150 consultations, 72 were received from other Government of Canada institutions, which is a 29% decrease from 2017-2018. Moreover, 1,730 pages to review were received from other organizations for review.

During the 2018-2019 period, the RCMP initiated a total of 47 consultations with other federal and municipal government institutions.

Complaints and Investigations

The ATIP Branch received 184 complaints under the *Privacy Act* during the 2018-2019 fiscal year. The most common complaints were exemption related and deemed refusal complaints. The RCMP made no formal representation pursuant to section 33 and received no 'report of findings with recommendations' from the Privacy Commissioner pursuant to section 35.

During the 2018-2019 reporting period the RCMP coped with a lack of resources. Nonetheless, 147 complaints were closed.

Appeals

During this fiscal year, there was no application related to the *Privacy Act* submitted to the Federal Court.

Conclusion

The achievements outlined in this report demonstrate the RCMP's ongoing commitment to delivering on our institutional obligations and responsibilities under the *Privacy Act*, and to continue improving service standards in 2019-2020. To achieve this goal, the RCMP will further broaden ATIP training functions to enhance employee understanding and responsibilities inherent under the *Act*. Further, functional, procedural and structural changes will be implemented within the ATIP Branch to ensure the RCMP is positioned to meet existing challenges and be more responsive to future demands. These changes will be informed by an internal, risk-based, audit of the ATIP Branch to be completed in June 2019.

Appendix C

Delegation Order

Access to Information Act and Privacy Act Delegation Order

Ordonnance de délégation de pouvoir en vertu de la Loi sur l'accès à l'information et de la Loi sur la protection des renseignements personnels

The Minister of Public Safety and Emergency Preparedness, pursuant to section 73 of the *Access to Information Act* and of the *Privacy Act*, hereby designates the persons holding the position set out in the schedule hereto, or the persons occupying on an acting basis those positions, to exercise the powers and functions of the Minister as the head of a government institution, that is, the Royal Canadian Mounted Police, under the section of the Act set out in the Schedule opposite each position. This designation replaces and nullifies all such designations previously signed and dated by the Minister.

En vertu de l'article 73 de la *Loi sur l'accès à l'information* et de la *Loi sur la protection des renseignements personnels*, le Ministre de la Sécurité publique et de la Protection civile délègue aux titulaires des postes mentionnés à l'annexe ci-après, ou qu'aux personnes occupant à titre intérimaire lesdits postes, les attributions dont il est, en qualité de responsable d'une institution fédérale, c'est-à-dire, la Gendarmerie royale du Canada, investi par les articles de la Loi mentionnés en regard de chaque poste. Le présent document remplace celui précédemment signé par le ministre.

SCHEDULE/ANNEXE

Position/Poste	<i>Privacy Act and Regulations/ Loi sur la protection des renseignements personnels et règlements</i>	<i>Access to information Act and Regulations/ Loi sur l'accès à l'information et règlements</i>
Commissioner of the RCMP / Commissaire de la GRC Chief, Strategic Policy and Planning Officer / Dirigeante principale de la planification et des politiques stratégiques Departmental Access to Information and Privacy Coordinator / Coordonnateur ministériel de l'accès à l'information et de la protection des renseignements personnels	Full Authority / Autorité absolue	Full Authority / Autorité absolue
Commanding Officers / Commandants Divisionnaires	Authority for 8(2)(j) and 8(2)(m)/ Autorité pour 8(2)(j) et 8(2)(m)	N.A./s.o.

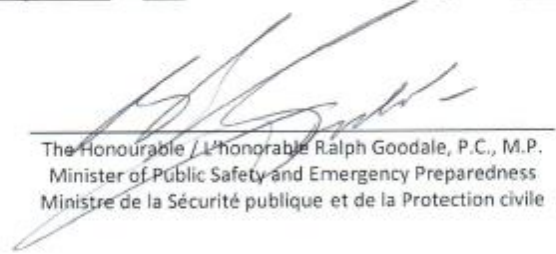
<p>Officer in Charge, Policy, Processing and External Relations / Officier responsable des politiques, traitement et relations externes</p> <p>Manager, Processing and Triage / Responsable, Groupe de traitement et triage</p> <p>Manager, Quality Control / Gestionnaire, contrôle de la qualité</p> <p>Non-Commissioned Officers and public servants in charge of ATIP unit / Sous-officiers et fonctionnaires responsables des unités de l'AIPRP</p>	<p>Full Authority except 8(2)(j) and 8(2)(m) / Autorité absolue à l'exception de 8(2)(j) et 8(2)(m)</p>	<p>7, 8(1), 9, 11(2) to 11(6) (inclusive), 12(2) and all mandatory exemptions (13(1), 16(3), 19(1), 20(1) and 24(1)) and 6(1) and 8 of the Regulations / 7, 8(1), 9, 11(2) à 11(6) (inclusivement), 12(2) et toutes les exceptions obligatoires (13(1), 16(3), 19(1), 20(1) et 24(1)) de la Loi, et 6(1) and 8 du règlements</p>
<p>Non-commissioned officers and public servants in charge of ATIP branch (analysts) / Sous-officiers et fonctionnaires responsables au sein des unités de l'AIPRP (réviseurs)</p>	<p>14 and 15 for all records; 17(2)(b), 19 to 28 (inclusive) for all employee records as designated in InfoSource; For all other records requiring mandatory exemptions in their entirety (19(1), 22(2) and 26) of the Act; 9 and 11(2) of the Regulations / 14 et 15 pour tous les dossiers; 17(2)(b), 19 à 28 (inclusivement) pour tous les dossier d'employés tels que désigné dans InfoSource; pour tous les dossiers nécessitant des exceptions obligatoires en entier (19(1), 22(2) et 26) de la Loi; 9 et 11(2) du règlements</p>	<p>7, 8(1) and 12(2)(b) and all records exempted in their entirety by mandatory exemptions (13(1), 16(3), 19(1), 20(1) and 24(1)) of the Act; 6(1) and 8 of the Regulations / 7, 8(1) et 12(2)(b) pour tous les dossiers nécessitant des exceptions obligatoires en entier (13(1), 16(3), 19(1), 20(1) and 24(1)) de la Loi; 6(1) et 8 du règlements</p>

Signed, at the City of Ottawa, this

Signé, à Ottawa, ce

4 day of Dec, 2015

jour de _____, 20____



The Honourable / L'honorable Ralph Goodale, P.C., M.P.
 Minister of Public Safety and Emergency Preparedness
 Ministre de la Sécurité publique et de la Protection civile

Appendix D

Statistical Report on the *Privacy Act*



Statistical Report on the *Privacy Act*

Name of institution: Royal Canadian Mounted Police

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

Part 1: Requests Under the *Privacy Act*

	Number of Requests
Received during reporting period	4289
Outstanding from previous reporting period	4009
Total	8298
Closed during reporting period	4808
Carried over to next reporting period	3490

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	26	49	88	43	20	77	36	339
Disclosed in part	76	232	540	243	139	673	414	2317
All exempted	4	11	32	12	6	13	3	81
All excluded	0	0	0	0	0	0	0	0
No records exist	140	119	82	63	22	79	64	569
Request abandoned	451	71	103	58	40	71	690	1484
Neither confirmed nor denied	2	3	1	3	1	7	1	18
Total	699	485	846	422	228	920	1208	4808

2.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(a)(i)	54	23(a)	0
19(1)(a)	6	22(1)(a)(ii)	165	23(b)	0
19(1)(b)	6	22(1)(a)(iii)	1	24(a)	0
19(1)(c)	362	22(1)(b)	462	24(b)	0
19(1)(d)	116	22(1)(c)	1	25	0
19(1)(e)	1	22(2)	0	26	1835
19(1)(f)	0	22.1	0	27	27
20	0	22.2	0	28	8
21	1	22.3	0		

2.3 Exclusions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
69(1)(a)	8	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)	1
		70(1)(c)	0	70.1	0

2.4 Format of information released

Disposition	Paper	Electronic	Other formats
All disclosed	202	137	0
Disclosed in part	1074	1239	4
Total	1276	1376	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	21123	18055	339
Disclosed in part	426180	265097	2317
All exempted	7425	0	81
All excluded	0	0	0
Request abandoned	10473	0	1484
Neither confirmed nor denied	0	0	18
Total	465201	283152	4239

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	292	2440	35	7086	8	4761	4	3768	0	0
Disclosed in part	1772	30128	349	51047	99	58832	89	107457	8	17633
All exempted	63	0	15	0	3	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	1462	0	16	0	4	0	2	0	0	0
Neither confirmed nor denied	15	0	2	0	0	0	0	0	0	0
Total	3604	32568	417	58133	114	63593	95	111225	8	17633

2.5.3 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	1	0	1	0	2
Disclosed in part	33	0	445	2	480
All exempted	0	0	4	0	4
All excluded	0	0	0	0	0
Request abandoned	1	0	1	0	2
Neither confirmed nor denied	0	0	0	0	0
Total	35	0	451	2	488

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
2841	2100	215	377	149

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	150	52	202
16 to 30 days	93	33	126
31 to 60 days	118	24	142
61 to 120 days	196	42	238
121 to 180 days	176	29	205
181 to 365 days	756	124	880
More than 365 days	181	867	1048
Total	1670	1171	2841

2.7 Requests for translation

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

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

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Subsection 8(5)	Total
1	32	32	65

Part 4: Requests for Correction of Personal Information and Notations

Disposition for Correction Requests Received	Number
Notations attached	3
Requests for correction accepted	1
Total	4

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	286	0	0	0
Disclosed in part	1961	0	0	0
All exempted	73	0	0	0
All excluded	0	0	0	0
No records exist	425	0	0	0
Request abandoned	308	0	0	0
Total	3053	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	3053	0	0	0
Total	3053	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	73	5661	84	1730
Outstanding from the previous reporting period	7	987	2	145
Total	80	6648	86	1875
Closed during the reporting period	72	4626	78	1609
Pending at the end of the reporting period	8	2022	8	266

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	25	12	6	3	0	0	0	46
Disclosed in part	10	2	6	2	1	2	1	24
All exempted	0	1	0	0	0	0	0	1
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	1	0	0	0	0	0	0	1
Total	36	15	12	5	1	2	1	72

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	34	15	3	2	0	0	0	54
Disclosed in part	8	7	4	1	0	0	0	20
All exempted	1	0	0	0	0	0	0	1
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	1	2	0	0	0	0	3
Total	43	23	9	3	0	0	0	78

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	1	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		
Total	1	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
184	0	0	0	184

Part 9: Privacy Impact Assessments (PIAs)

Number of PIA(s) completed	2
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Part 10: Resources Related to the *Privacy Act*

10.1 Costs

Expenditures		Amount
Salaries		\$2,619,382
Overtime		\$75,363
Goods and Services		\$283,340
• Professional services contracts	\$117,247	
• Other	\$166,093	
Total		\$2,978,085

10.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	31.00
Part-time and casual employees	3.00
Regional staff	0.00
Consultants and agency personnel	2.50
Students	0.50
Total	37.00

Note: Enter values to two decimal places.