

Access to Information and Privacy Acts
Annual Reports

April 1, 1994, to March 31, 1995



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Ministre de l'Industrie

Ottawa, Canada K1A 0H5

The Honourable

L'honorable

John Manley P.C., M.P. c.p., député

His Excellency the Right Honourable Roméo LeBlanc, P.C., C.C., C.M.M., C.D. Governor General of Canada Government House
1 Sussex Drive
Ottawa, Ontario
K1A 0A1

Your Excellency:

I have the honour to submit to Your Excellency the Annual Reports on the administration of the *Access to Information Act* and the *Privacy Act* for the period April 1, 1994, to March 31, 1995, in accordance with Section 72 of the legislation. These reports concern the activities of Industry Canada.

Yours very truly,

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# **Preface**

The Access to Information Act and the Privacy Act (Revised Statutes of Canada, Chapter A-1, 1985) were proclaimed on July 1, 1983.

The Access to Information Act gives Canadian citizens and permanent residents a broad right of access to information contained in government records subject to certain specific and limited exceptions. The Privacy Act extends to individuals the right of access to information about themselves held by the government, again subject to specific and limited exceptions. The law also protects the individual's privacy by preventing others from having access to personal information and gives individuals substantial control over its collection and use.

Section 72 of the Access to Information Act and Section 72 of the Privacy Act require that the head of every government institution shall prepare for submission to Parliament an annual report on the administration of the Acts within the institution during each financial year.

These annual reports are intended to describe how Industry Canada administered its responsibilities in the 12th year of operation of the Access to Information Act and the Privacy Act.

# **Background on the Department**

To provide a better understanding of the context in which access requests are dealt with, this section presents background information about the department.

Industry Canada as a key economic department is mandated to make Canada more competitive by fostering the development of Canadian business; by promoting a fair and efficient Canadian marketplace; and by protecting, assisting and supporting consumer interests. In carrying out this mandate, it is responsible for:

- formulating, integrating and coordinating policies and regulations that relate to industry sector development, science, telecommunications, information technologies, investment and competition in the marketplace;
- providing strategic business intelligence and analysis and other vital business services;
- helping industry to develop and apply research and technology and to build international ventures involving scientists and business;
- assisting Canada's manufacturing and service industries to become competitive in Canada, in the North American Free Trade Agreement and throughout the world;
- defending Canada's interests in bilateral and multilateral negotiations regarding international radiowave spectrum allocations and the development and application of international, regional and national standards;
- administering programs that set voluntary guidelines for industry such as Textile Care Labelling and Environmental Labelling and, where required, establishing and enforcing regulations that help protect consumer interests;
- assuring a modern regulatory framework for the orderly conduct of business as well as enforcing and administering related legislation;
- working to reduce internal barriers to trade;

- giving the Canadian taxpayer better access to the federal government's programs and services for business;
- promoting Aboriginal business development across Canada; and
- encouraging regional economic development in northern Ontario.

# 1. Report on the Access to Information Act

# 1.1 Organization of Access to Information Act and Privacy Act Activities

The Information and Privacy Rights Administration (IPRA) oversees the implementation of the access to information and privacy legislation and is staffed on a full-time basis. The IPRA is headed by a Senior Departmental Advisor (often referred to as the *Coordinator*). The Senior Departmental Advisor reports directly to the Corporate Secretary who, in turn, reports to the Deputy Minister. One of the IPRA's responsibilities is to provide independent advice to senior management on the operation of the legislation and the disposition of access cases.

Other equally important responsibilities of the IPRA include the following:

- developing policies, procedures and guidelines for the orderly implementation of the Acts:
- promoting awareness of the legislation to ensure departmental responsiveness to the obligations imposed on the government;
- monitoring departmental compliance with the Acts, regulations, procedures and policies;
- acting as spokesperson for the department in dealings with the Treasury Board Secretariat, the Information and Privacy Commissioners, and other government departments and agencies;
- coordinating activities for maintaining current inventories of departmental information holdings;
- reviewing and approving information collections in accordance with the government's policy on information collections and public opinion research; and
- coordinating the preparation of information for management and parliamentary reports as well as other material that may be required by central agencies.

The administration of the legislation within Industry Canada is also facilitated at the branch and regional office levels. Each organizational sector has a liaison officer (who normally reports to an Assistant Deputy Minister, Regional Executive Director, etc.) to assist their sector by coordinating activities and providing guidance on the operation of the Acts and departmental directives and procedures.

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# 1.2 Processing of Formal Requests: Summary

All formal access requests are forwarded to the IPRA where they are reviewed for clarity and for conformity with the legislation. Each request is then assigned to an organizational sector of the department, which becomes responsible for locating and retrieving the records containing the information sought, and assisting in determining the costs and fees for processing the request.

After a review of the relevant records, the organizational sector is responsible for formulating recommendations on the disposition of the case. These are evaluated by the IPRA before a final recommendation is presented by the IPRA to senior management. This departmental review process is intended to provide an effective system of checks and balances in the treatment of *Access to Information Act* requests.

Once a decision has been rendered, the requester is notified by the IPRA and the organizational sector arranges to provide access to all disclosable records.

# 1.3 Summary of Activities and Highlights

During the period under review, Industry Canada received 361 requests. In addition, a total of 16 different government institutions consulted Industry Canada on 50 different cases. This accounted for 14 percent of the IPRA's caseload.

The department is the recipient of considerable commercial, technical and financial third-party information and, as in past years, most of the requests received by Industry Canada were for records containing third-party information. Included are business sales statistics and projections, capital costs, market analyses and strategies, applied technology of industrial plants, customer and supplier lists, and investment plans. While considerable third-party information is of a sensitive nature, Industry Canada has endeavoured to release as much information as possible consistent with the intent of the law and the severability provisions of Section 25 of the Act.

Industry Canada's efforts to maximize the release of information to the public are reflected in the 1994/95 figures. Taking into account only those cases where the department was able to process the request, information was released either in whole, in part or on an informal basis for 93 percent of cases. Users had access to complete records in 45 percent of these cases.

There remained several instances where the department was prohibited from disclosing information under Sections 19, 20 and 21 of the Act. Sections 19, 20 and 21 account for the majority of exemptions claimed by the department.

The nature and source of information requested often required consultations with third parties or other government institutions. The complexity of these consultations necessitated, in some instances, extensions to the time limit prescribed by Section 7 of the Act. Despite this, in almost 82 percent of completed cases a response was provided in 30 or fewer days.

Industry Canada has endeavoured to work closely with users of the Access to Information Act and, in keeping with the spirit of the Act, has treated cases informally whenever possible. Requesters were able to obtain access to information on an informal basis in 13 percent of the completed cases.

Users of the Access to Information Act come from the media, academic circles, business sectors, organizations and the general public. In 1994/95, business was the largest source of requests. In about 37 percent of the cases completed, the requests originated from business. Requests submitted by the general public were a close second (about 35 percent). The province of Ontario accounted for the vast majority of requests.

# 1.4 Statistical Report — Interpretation and Explanation

Annex A provides a summarized statistical report on the Access to Information Act applications dealt with during the period from April 1, 1994, to March 31, 1995. The following provides explanations and interpretations for information contained in this report.

# I. Requests under the Access to Information Act

Of the 391 requests dealt with during this reporting period, 361 requests (92 percent) were new requests, while 30 requests (8 percent) were carried forward from the previous year.

While keeping in mind the limitations faced regarding available data, Annex B attempts to categorize the requests completed by Industry Canada in terms of known affiliations.

# II. Disposition of Requests Completed

Of the 391 requests dealt with, 342 requests (87 percent) were completed during the 1994/95 reporting period. It follows that 49 requests (13 percent) remained to be processed as at March 31, 1995. The completed requests are categorized as follows:

All Disclosed — Of the 342 completed requests, the requesters were provided with total access to the relevant records in 114 cases.

**Disclosed in Part** — In another 95 instances, the requesters were granted partial access. The cases where no access could be provided were mostly attributable to situations beyond the control of the department (e.g. requests abandoned, requests transferred or records that did not exist).

Nothing Disclosed (Excluded) — There was one request for which information could not be disclosed because all of the information was excluded under the Act.

**Nothing Disclosed (Exempt)** — There were five requests for which information could not be disclosed because all of the information was exempt under the Act.

**Transferred** — Of the 342 requests completed, 14 concerned records not under the control of the department. These requests were transferred to the appropriate government institution in accordance with the Act.

**Unable to Process** — The department was unable to process requests in 35 cases.

Abandoned by Applicant — Of the completed access requests, 32 were eventually considered abandoned.

**Treated Informally** — In 46 cases, it was determined that the information could be released informally rather than through the formal procedures of the Act.

# III. Exemptions Invoked

As noted in Annex A, exemptions under Sections 13, 14, 15, 16, 17, 19, 20, 21, 22, 23, 24 and 26 of the *Access to Information Act* were invoked by the department in dealing with its cases. The Annex is intended to show the types of exemptions invoked to deny access. For example, if in one request five different exemptions were used, one exemption under each relevant section would be reported for a total of five. If the same exemption is used several times for the same request, it is reported only once.

## IV. Exclusions Cited

The Access to Information Act does not apply to records considered confidences of the Queen's Privy Council pursuant to Section 69 of the Act. As in the case of exemptions, Annex A is intended to show the types of exclusions invoked to deny access. For example, if in one request five different exclusions were used, one exclusion under each relevant section would be reported for a total of five. If the same exclusion is used several times for the same request, it is reported only once.

## V., VI. Completion Time and Extensions

In about 82 percent of completed cases, the department was able to respond within 30 days; 9 percent within 31 to 60 days; 5 percent within 61 to 120 days; and 4 percent took more than 120 days to complete.

## VII. Translations

No translations were required in dealing with these requests.

#### VIII. Method of Access

In 189 cases, the requesters received copies of the material they were seeking. In one case, the requester examined the records in person. In 19 cases, access was provided by a combination of copies and an in-person examination. It should be noted that this category reflects only those requests where information was all disclosed or disclosed in part.

#### IX. Fees

The fees collected during the reporting period totalled \$4 135. It is the department's practice to waive fees where the total owing per request amounts to less than \$25. As a result, fees were waived in 172 instances representing the sum of \$1 568.

Fees collected in 1994/95 are estimated to represent 1.1 percent of the department's total costs shown below.

#### X. Costs

Total salary costs associated with *Access to Information Act* activities are estimated at \$325 398 for 1994/95. Other costs amounted to \$35 014 for a total of \$360 412. The associated full-time employee resources for 1994/95 are estimated at 6.9. Because of the difficulty of collecting complete time costs from responsibility centres, the aforementioned figures are believed to be underestimated.

In keeping with government guidelines, the department was consulted by other government institutions in a number of cases (50 in 1994/95) where the records sought from these institutions related to the activities of Industry Canada. The cost figures shown above include the resources used in dealing with these cases. However, statistics on these 50 cases are not otherwise reflected in other items of Annex A.

# 1.5 Special Issues

## **Complaints to the Information Commissioner**

Please see the Information Commissioner's 1994/95 Annual Report to Parliament.

# Appeals to the Federal Court

Four appeals to Federal Court were carried forward into the 1994/95 reporting year. Three appeals remained outstanding and one appeal has been adjourned *sine die*.

## **Employee Awareness**

The administration of the Access to Information Act and the Privacy Act involves a delicate balancing of rights and interests. This, coupled with the complex character of the legislation, underlines the importance of employee sensitivity to the obligations imposed on government institutions.

As explained in previous annual reports, considerable efforts have been directed toward preparing departmental staff for the implementation of the access to information and privacy legislation both before its enactment and afterward. The legislation was disseminated throughout the department. Early efforts to sensitize employees to their responsibilities were undertaken through detailed seminars. Departmental awareness is also maintained through the policies and procedures contained in the *Access to Information and Privacy Manual*.

## **Delegation of Authority**

Under Section 3 of the Access to Information Act, the minister of the department is designated head of the government institution for the purposes of the Act. Several responsibilities have been delegated to departmental officials, pursuant to Section 73 of the Act, in order to provide for some administrative flexibility.

#### Fees

The Access to Information Act authorizes fees for certain activities related to the processing of formal requests under the Act. In addition to an application fee of \$5, search, preparation and reproduction charges may apply to various records. Current fees are specified in the Access to Information Regulations. No fees are imposed for reviewing records, or for administrative, overhead or shipping costs. Moreover, in accordance with Section 11 of the Act, no fees are charged for the first five hours required to search for a record or prepare any part of it for disclosure.

The \$5 application fee is refunded when the information requested can be provided informally without charge.

The Access to Information Act permits the waiving of fees when this is deemed to be in the public interest. In accordance with Treasury Board guidelines, the department has routinely waived fees under \$25. For fees over \$25, the department examines fee waiver requests on a case-by-case basis. In considering such requests, the department has, for example, taken into account costs in processing each access application and the degree of public benefit to be derived from the release of the disclosable information.

As indicated elsewhere in this report, the fees collected by the department represent only 1.1 percent of the legislation's total administration costs.

## **Reading Rooms**

Section 71 of the Act requires government institutions to provide facilities where the public may inspect manuals used by employees of the institution in administering or carrying out programs or activities. In accordance with this section, reading rooms were established by the department at headquarters and in all regional offices in the summer of 1983. Departmental manuals, the department's entries for the Government of Canada's *Info Source* publication, access request forms and general information for the public on how to exercise their rights under the Act are intended to be available through these facilities.

# 2. Report on the *Privacy Act*

# 2.1 Organization of *Privacy Act* Activities

Certain features that were common to the implementation of both the Access to Information Act and the Privacy Act are referred to on page 5.

# 2.2 Processing of Formal Requests

The processing of formal requests under the *Privacy Act* is the same as the process for the *Access to Information Act* as described on page 6.

# 2.3 Summary of Activities and Highlights

Forty-eight requests were made under the *Privacy Act* in 1994/95. In addition, a total of four different government institutions consulted Industry Canada on five different cases. This accounted for 10 percent of the IPRA's caseload. No corrections or notations were sought by requesters pursuant to the terms of the Act.

Efforts to maximize the release of information under the legislation are evident from the 1994/95 figures. Taking into account only those cases where the department was able to process the request, information was released either in whole or in part for 96 percent of cases. Users had access to complete records in 52 percent of these cases.

There remained several instances where the department was prohibited from disclosing information under Section 26 of the Act. Section 26 accounts for the majority of exemptions claimed by the department.

The nature and source of information requested required consultations with other government institutions. The complexity of these consultations necessitated extensions to the time limit prescribed by Section 14 of the Act. In almost 79 percent of completed cases, a response was provided within 30 or fewer days.

The department is the recipient of personal information, including information about employees and other individuals such as applicants for loans and grants. There is a continued, substantial effort on the part of the department to provide individuals with access to their personal information without formal recourse to the *Privacy Act*.

# 2.4 Statistical Report — Interpretation and Explanation

Annex C provides a summarized statistical report on the requests for personal information received under the *Privacy Act* that were dealt with in the period from April 1, 1994, to March 31, 1995. The following provides explanations and interpretations for information contained in this report.

## I. Requests under the *Privacy Act*

Forty-eight requests were received by Industry Canada during this reporting period. There were no requests carried over from the previous year.

## II. Disposition of Requests Completed

Of the 48 requests dealt with, all 48 were completed during the 1994/95 reporting period. The completed requests are categorized as follows:

All Disclosed — In 14 cases, the requesters were granted full access.

**Disclosed in Part** — In 12 cases, the requesters were granted partial access.

**Unable to Process** — In 13 cases, no records were found.

Abandoned by Applicant — In eight cases, the requesters abandoned the request.

**Transferred** — In one case, the request was transferred to the appropriate government institution in accordance with the Act.

# III. Exemptions Invoked

Sections 26, 27 and 28 were the exemptions invoked.

## IV. Exclusions Cited

No exclusions were cited in dealing with these requests.

# V. Completion Time

Thirty-eight cases were disposed of within 30 days. Six were completed within 31 to 60 days and two within 61 to 120 days. Two cases took 121 days or more to complete.

## VI. Extensions

Two extensions were required under the Act.

#### VII. Translations

No translations were undertaken in dealing with these requests.

#### VIII. Method of Access

Copies of the records were given in response to 26 requests.

#### IX. Corrections and Notation

No requests for corrections or notation were received.

#### X. Costs

Total salary costs associated with *Privacy Act* activities are estimated at \$35 891 for 1994/95. Other costs were estimated at \$3 889 for a total cost of \$39 780. The associated full-time employees resources for 1994/95 are estimated at .7.

# 2.5 Special Issues

## **Complaints to the Privacy Commissioner**

Please see the Privacy Commissioner's 1994/95 Annual Report to Parliament.

## Appeals to the Federal Court

One appeal was carried forward into the 1994/95 reporting year and has been adjourned sine die.

## **Employee Awareness**

The importance of sensitizing employees to the requirements of the *Privacy Act* has been recognized. See page 9.

## **Delegation of Authority**

Under Section 3 of the *Privacy Act*, the minister of the department is designated head of the government institution for the purposes of the Act. Several responsibilities have been delegated to departmental officials, pursuant to Section 73 of the Act, in order to provide for administrative flexibility.

#### **Exempt Banks**

No personal information bank has been designated as exempt in accordance with Section 18 of the *Privacy Act*.

# Disclosure under Paragraph 8(2)(e) of the Privacy Act

Through the department's Access to Information and Privacy Manual, staff are advised that disclosures of information under paragraph 8(2)(e) are strictly regulated. Any requests for disclosure received under this provision are referred to the Senior Departmental Advisor of the IPRA for review. The Senior Departmental Advisor reviews the request with the senior official in the department responsible for the personal information bank or the personal information class containing the information sought. Disclosures under paragraph 8(2)(e) require the approval of the Senior Departmental Advisor.

#### Collection, Use and Disclosure of Personal Information

The department's Access to Information and Privacy Manual outlines the intent and requirements of the Privacy Act and Treasury Board guidelines regarding the collection, use, disclosure, retention and disposal of personal information so that all staff are aware of their responsibilities for the proper management of information holdings. In particular, staff are informed of their responsibilities in ensuring that all uses and disclosures of personal information are recorded and accounted for, by documenting all activities relating to personal information and maintaining the relevant material on official departmental files.

Responsibility centres are also advised to consult with the departmental IPRA before collecting any personal information, as well as in situations where there is any doubt concerning which rules to apply in the retention and disposal of personal information.

Further, the IPRA must be notified where personal information in a personal information bank is used or disclosed for a use consistent with the purpose for which the information was obtained or compiled by the department, but where such a use is not included in the statement of consistent uses published in *Info Source*.

# Annex A

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# Annex C

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Government of Canada

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# REPORT ON THE PRIVACY ACT RAPPORT CONCERNANT LA LOI SUR LA PROTECTION DES RENSEIGNEMENTS PERSONNELS

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