



Veterans Affairs
Canada

Anciens Combattants
Canada

Canada

ANNUAL REPORT

on the Administration of the
Privacy Act

2022-2023

The Honourable Ginette Petitpas Taylor
Minister of Veterans Affairs and Associate Minister of National Defense

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Introduction

At Veterans Affairs Canada (VAC), we value our clients' contributions to the development of Canada as a nation, and honour the sacrifices they have made in the defence of freedom and the pursuit of world peace. As an expression of Canada's gratitude to our Veterans, we strive to exemplify the high principles they have defended, and to be as open and transparent as possible, which shows that we are accountable and responsible for our actions and accept the consequences of our decisions.

The *Privacy Act* operates to protect the personal information of Canadians that is held by the Government of Canada. All individuals, whether they are within or outside Canada, may request access to any personal information about themselves under the control of a federal institution. The Act also provides the framework for the collection, accuracy, use, disclosure, retention and disposition of personal information. Personal information may only be used for the purposes allowed by the *Privacy Act*, and may only be disclosed in accordance with the legislation. This Act complements other departmental legislation and procedures for the collection, use and disclosure of personal information.

Veterans and their families entrust us with their personal information every time they apply for and access our programs, services, and benefits. Protecting their personal information is a priority and we are committed to the proper handling and use of this information.

Our report on the administration of the *Privacy Act* provides a summary of our activities and performance during the period from April 1, 2022, to March 31, 2023, and includes an interpretation and explanation of the performance data found in our statistical reports to the Treasury Board of Canada Secretariat (TBS).

The report has been prepared and tabled in Parliament in accordance with s. 72 of the *Privacy Act*.

The report for the Office of the Veterans Ombudsman on their administration of the *Privacy Act* is attached to this report as Annex A.

About Veterans Affairs Canada

Canada's development as an independent country with a unique identity stems partly from its achievements in times of war. VAC exists to assist and help those whose courageous efforts gave us this legacy and contributed to our growth as a nation.

The [Department of Veterans Affairs Act](#) provides authority to the Minister of Veterans Affairs to administer Acts of Parliament and orders in council, as are not by law assigned to any other federal department or any Minister, for the care, treatment and re-establishment in civil life of Veterans and the care of their dependents and survivors, and such other matters as the Governor in Council may assign.

Our mandate is to support the well-being of Veterans and their families, and to promote recognition and remembrance of the achievements and sacrifices of those who served Canada in times of war, military conflict and peace. To achieve this mandate, the Department focuses on its four main roles:

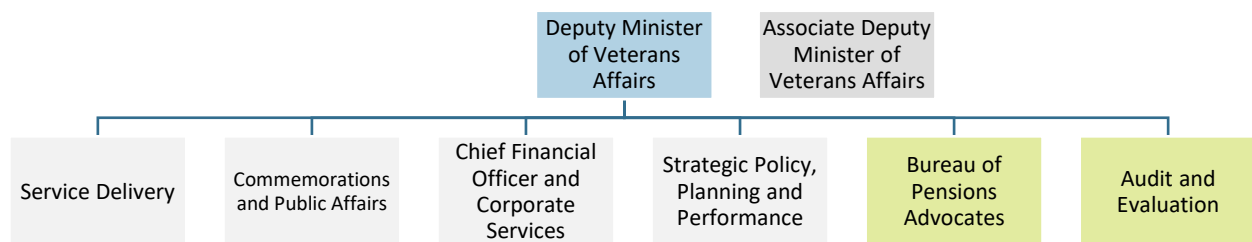
- Provide leadership as a champion of Veterans, and administer and coordinate needed benefits and services; whether through the Government of Canada or in partnership with provincial and community programs and non-governmental organizations.
- Help Veterans access the supports and services they need, from all levels of government and the community at large, and maintain a leadership role in the care and support of all Veterans and their families.
- Listen to the suggestions of Veterans, their representatives and stakeholders to guide work and research, and strive to design and deliver programs that meet the modern and changing needs of Veterans and their families.
- Engage Canadians of all ages in paying tribute to Veterans and those who died in service, ensuring that the legacy of their tremendous contributions to peace and freedom is preserved for generations to come.

Our Department fulfills its mandate and role through the delivery of programs such as disability benefits, financial benefits, rehabilitation, pension advocacy, education, and training supports. The Department also works to commemorate the achievements and sacrifices of Canadians during periods of war, military conflict and peace. We serve a highly diverse group, reflecting the remarkable breadth of Canada's contributions to world peace.

The Veterans Affairs Portfolio consists of:

1. the Department of Veterans Affairs, which reports to the;
2. the [Veterans Review and Appeal Board¹](#), which reports to Parliament through the Minister of Veterans Affairs; and
3. the [Office of the Veterans Ombud](#), a special advisor to the [Minister of Veterans Affairs](#);

The Department is made up of four branches and two divisions which report to the [Deputy Minister of Veterans Affairs Canada](#).



¹ A separate report on the administration of the *Access to Information Act* is tabled by the Veterans Review and Appeal Board.

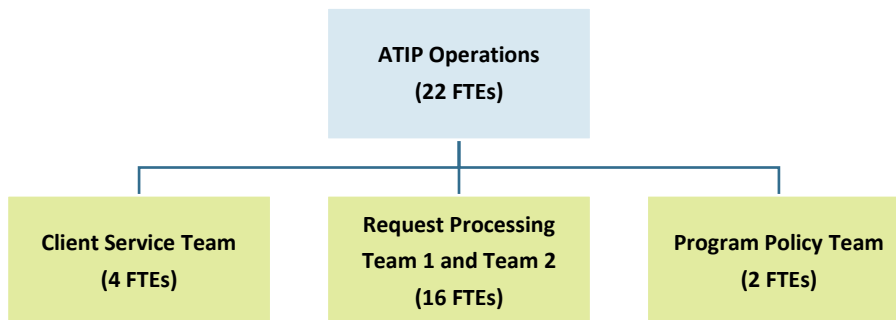
The Access to Information and Privacy Office

The Access to Information and Privacy (ATIP) Office is part of the Chief Financial Officer and Corporate Services Branch. This branch is responsible for supporting the Department in meeting Government of Canada requirements in areas such as financial stewardship, corporate reporting and key accountabilities. Privacy and Information Management (PIM) is within this branch and is where VAC's ATIP Office is located.

The ATIP Office administers both the *Access to Information Act* and the *Privacy Act*, and is situated in Charlottetown, Prince Edward Island. The Director of Privacy and Information Management is the head of the Office, and also serves as the Department's ATIP Coordinator. There are 4 units in PIM whose works relates to access to information and privacy - ATIP Operations (the ATIP Office), Privacy and Information Management (IM) Policy, IM Operations, and IM Projects.

The Privacy and IM Policy unit provides training, guidance, and recommendations on privacy and IM. This unit coordinates privacy impact assessments, privacy breach investigations, complaints from the Office of the Privacy Commissioner and works with all areas of the Department on various initiatives and new programs to ensure privacy and IM considerations are included. (7 FTEs).

The ATIP Operations Unit is responsible for administering the access to information and privacy request program. This team is responsible for processing requests in accordance with the Acts, as well as providing guidance to the branches on all matters related to this function. The ATIP Operations Unit has twenty-two full-time employees and is organized into four teams led by one Manager. These teams are:



The Client Service team receives the ATIP request from the public and consultation requests from other government departments. This team liaises with employees to obtain and retrieve documents required to process ATIP requests, imports and scans the retrieved documents, and provides the requestor with the release package.

The Request Processing Teams are responsible for processing formal and informal requests for personal information and government information, completing consults with other government departments and

third parties, and resolving complaints from oversight bodies, namely the Office of the Information Commissioner and the Office of the Privacy Commissioner.

The Program Policy Team provides strategic functional advice, guidance and support (i.e. writing procedure manuals, process maps, forms, letters) for ATIP Operations, VAC management and VAC employees. They also coordinate and review documents for proactive publication, and carry out the ATIP function for order paper questions.

We did not employ any consultants or contractors during the reporting period, nor were there any ATIP employees working in VAC's regional offices.

VAC was not a party to any service agreements under section 73.1 of the *Privacy Act*.

ATIP operational environment, including the impact of Covid-19

Our services shifted to a hybrid model for the workplace as re-occupancy of government offices began in 2022-23. Our operations were not affected by this shift, nor were they impacted by Covid-19.

Delegation orders

The responsibilities for administering the Privacy Act are delegated by the Minister of Veterans Affairs to VAC officials through a delegation order. Treasury Board of Canada Secretariat (TBS) has recommended that government institutions draft orders that are relevant to the size, the mandate and the culture of their institution. As such, VAC's delegation orders reflect our organizational structure and the nature of our work. Authorities have been given to a number of leadership positions in our Department, including the Deputy Minister, the Assistant Deputy Minister of Corporate Services, the Director General of Information Technology, Information Management, Administration, and Privacy Division, and the Director of Privacy and Information Management.

Our orders ensure that appropriate administrative authorities have been delegated to the ATIP officials responsible for effectively and efficiently administering the Act. The signed delegation order is included in Annex B of this report.

The Department reviewed its delegation orders during the reporting period. The updated orders will be included in the 2023-24 report to Parliament.

Improving Access to Information

Veterans, their families, and Canadians are very curious about the work we do at VAC, as such we receive many inquiries about our programs and services. As the sharing arm for the Department, the ATIP Office is responsible for finding and sharing the records that are of interest to these groups. This function is carved out for us in the *Access to Information Act* and the *Privacy Act*. We work within this legislative framework to connect with the branches (who are the creators and keepers of departmental records) to retrieve all relevant records; review the records for sensitivities in accordance with the Acts; and share the records with those who have requested them.

Ensuring seamless access to records is a priority for our office because the public's right of access is a foundational pillar on which public trust and confidence are built. In order to provide seamless access we need to be able to:

- conduct an accurate and complete search of all government records in all formats (e.g. by ensuring capacity to search and pull relevant records from all software and systems – archived and current);
- deliver relevant records on time for processing by the ATIP Office;
- have the tools and guidance available to facilitate the work of the ATIP Officers; and
- have access to improved technology to gain efficiencies in processing the records.

We have focused our attention this past year on looking for ways to gain efficiencies in the above areas, and to pivot to processes and practices that allow for better ways to do our work.

During the reporting period, we participated in initiatives and projects, and worked on policies, guidelines and procedures to improve our ATIP program. Some highlights of this work are captured below.

Initiatives and Projects

Participating in ATIP Community Opportunities

During the reporting period, we were able to participate in TBS-led community of practice meetings and other community meetings with ease and equal opportunity since geographical limitations and cost barriers no longer existed for us due to the technological advancements made as a result of the Covid-19 pandemic. Through opportunities and collaboration, we were able to:

- participate in all of TBS's ATIP Community Meetings (June, September, January) and their Deep Dive Sessions;
- join a pilot project with TBS on the new ATIP Online Request Service (AORS);
- provide comments on TBS's draft directives on Open Government and Proactive Publication;
- join the inter-institutional Proactive Publication Working Group;
- participate in the ATIP Interdepartmental Modernization Consultation Group; and
- be kept up to date on initiatives and changes impacting the ATIP community as a whole.

It is our view that government-wide collaboration is stronger and easier than ever. And learning from one another has never been more important given the growth and changes in the world of access to information and privacy.

We believe that these connections allow for a more cohesive and united community where the exchange of practices, ideas and advancements and accomplishments benefit the whole ATIP community and the public who rely on us to meet their information needs. We look forward to fostering, maintaining and furthering these connections as hybrid models become the way forward.

Applying an “ATIP-by-design” lens to departmental initiatives

We are working to increase awareness in our Department surrounding the need for, and importance of, applying an ATIP lens to program design work. This means we identify the business and contract requirements for ATIP (e.g. how are we going to retrieve within a business system or from a contractor) in the design of new departmental programs, initiatives, contracts and business systems. We highlight the importance to program areas of identifying ATIP requirements at the front end in order to reduce, and possibly eliminate risks. It also helps to ensure that the most appropriate mitigation measures and strategies are put in place before implementation.

During the reporting period, ATIP Operations had the opportunity to:

- participate in a working group on the use of SharePoint as a new business solution;
- provide support and recommendations to contract administration on critical ATIP considerations and requirements for contracts; and
- participate in VAC’s IT Modernization project.

Our involvement in these initiatives means we are able to contribute an ATIP perspective at the front end which helps identify potential “issues” and areas for further exploration and consideration.

Additionally, we performed assessments, from a privacy and information management perspective, on new initiatives, projects, and IT systems using personal information which allowed VAC to identify and mitigate privacy risks prior to implementation. We completed 23 “Privacy, Information Management and Information Technology Security Needs Determination Reports” on various initiatives. Although there was a decrease in the number of needs determinations, we saw an increase in their complexity, largely due to the nature of the initiatives proposed, such as automation, automated decision-making, and artificial intelligence.

Experimenting with new tools

We tested the eDiscovery tool (which is part of the M365 license) to retrieve records from business systems. This was done because branches play a fundamental role in the retrieval of records for access to information and privacy requests, and the level of effort required by them to locate records is high. Experimenting with the eDiscovery tool aligned with the Department’s goal of using digital solutions when possible.

The goal of the experiment was to determine whether the tool:

- reduced the level of effort and engagement needed by the branches to perform a search;
- improved the timelines for searching for, and retrieving records;
- performed an accurate and reliable search and added value; and
- produced unexpected efficiencies.

The results of the experiment showed we can successfully retrieve some privacy requests and that more work is needed in this domain before the eDiscovery tool can be reliably used to locate records for formal access to information requests. We will continue to explore this work in 2023-24.

Working with internal clients

The ATIP Office provides services to internal clients, such as Human Resources. We review documents for sensitivities based on the intent of the Act.

During the reporting period, we had 31 instances in which internal clients consulted the ATIP Office to review documents for sensitivities. The nature of these documents included such things as identifying concerns related to personal information. In total we reviewed, 494 pages.

We also provided guidance to the branches on best practices for sharing information with VAC clients, and worked with other government institutions to support their respective program needs and requirements.

Acquiring new processing software

The ATIP Office uses the AccessPro Case Management (APCM) system and the AccessPro Redaction (APR) system to process access to information and privacy requests. The current version that is in use is outdated and will be unsupported by June 2024. For this reason, we have secured funding to move forward with acquiring a new software solution approved by TBS. We are working to acquire the new software in 2023 with the goal of implementing it in 2024.

Policies, Guidelines, and Procedures

In July 2022, TBS updated its ATIP policy instruments to reflect and support legislative changes made by Bill C-58. As a result of this update, we began work on reviewing and validating our own internal policies, processes and procedures. Some highlights of the improvements we made to our ATIP program that resulted from this work include:

- creating an internal process for releasing new, or updated, documents (i.e. procedures, processes, guidance, etc...) to ATIP Operations staff;
- developing and issuing monthly bulletins for ATIP Operations staff that contain important information about their work, upcoming ATIP Community Events and other practical and useful information related to working in the ATIP field; and
- writing guidance documents for all VAC employees on how to respond to ATIP requests.

We will continue to build on this work in 2023-24, and beyond, with the goal of aligning our tools with the updated TBS instruments, and modernizing our outdated internal processes.

Training and Awareness

We provided awareness training to 249 departmental staff during the reporting period. This included training in privacy awareness and a general overview and understanding of access to information and privacy. We continue to adapt and update our content to meet the needs of departmental staff as well

as to ensure the information is accurate and up to date. Details about the training sessions we delivered during the reporting period are as follows:

Privacy 101 Sessions

These more customized sessions focus on promoting awareness of VAC's Privacy and Information Management Directorate role, explaining the legislative framework, defining what "personal information" means, familiarizing participants with Personal Information Banks and how they apply to their everyday work, reviewing consent and when it is needed, and lastly providing guidance on what privacy breaches are and best practices to avoid them. In 2022-23, sessions were delivered to contractors. Details: 40 Participants in 3 Sessions (2 English sessions and 1 French session)

In addition to the above noted training, privacy and information management are included as part of the security training required for all new or renewal of employee security ID badges.

In 2023-24, we will be creating a full-time position dedicated to ATIP training. This position will focus on creating a training plan for both ATIP staff and VAC employees.

Monitoring and Compliance

We produce monthly reports to monitor our performance on the administration of the Act. These reports include data on timeliness for the retrieval of records, number of closed cases and number of cases and pages disclosed. We do quarterly reports to senior management, and use a dashboard that was successfully implemented in 2021-22. This dashboard allows for the fulsome view of key operational data that has both an internal interface for the ATIP Office and an external interface for VAC senior management.

The internal dashboard interface provides the ATIP Coordinator, ATIP manager and team leaders with workload management data (e.g. number of pages processed by Officer, number of requests in review, etc....) which allows them to more accurately track and review the status of requests. As such, they are able to better monitor deadlines, allocate resources and escalate outstanding retrievals – all key components of effective workload management.

The purpose of the external interface is to ensure that VAC senior management are up to date on the status of retrievals and the overall progress of processing requests. Key trends and items of note are highlighted to senior management on a quarterly basis through the Department's governance committees. We have found the dashboard to be a useful reporting tool and are continuously working with the IT team to make improvements in order to ensure optimal reporting.

We also have a full-time position devoted to reporting and data management. This role brings capacity to ATIP Operations by generating more timely and complex data, monitoring and identifying trends, capturing accurate historical data, performing quality control evaluations and reviewing critical performance measures from year to year.

Privacy and Information Management Policy review contracts, information sharing agreements and other agreements involving personal information. This ensures that appropriate privacy protection

clauses are noted that will address collection, use , disclosure, retention, and disposition as well as privacy breach requirements.

All of these reporting practices have been implemented to help improve completion times and meet legislative requirements.

Interpretation and Explanation of Annex C – 2021-22 Statistical Report on the *Privacy Act*

The Request Processing team is responsible for processing requests for personal information. This team has one team leader, two reviewers, and 7 processing officers who process formal and informal requests for personal information. What follows is an overview of key data on our Department’s performance for 2022-23, as reflected in our statistical report to TBS, [2022-23 Statistical Report on the *Privacy Act*](#) (attached as Annex C).

The following table provides an overview of the privacy requests we processed during the reporting period.

| Type of request | Total requests closed during the reporting period | Total pages processed | Total pages disclosed |
|--------------------|---|-----------------------|-----------------------|
| Privacy – formal | 2,256 | 357,910 | 356,484 |
| Privacy – informal | 97 | 15,219 | 15,219 |
| Total | 2,353 | 373,129 | 371,703 |

Formal Requests

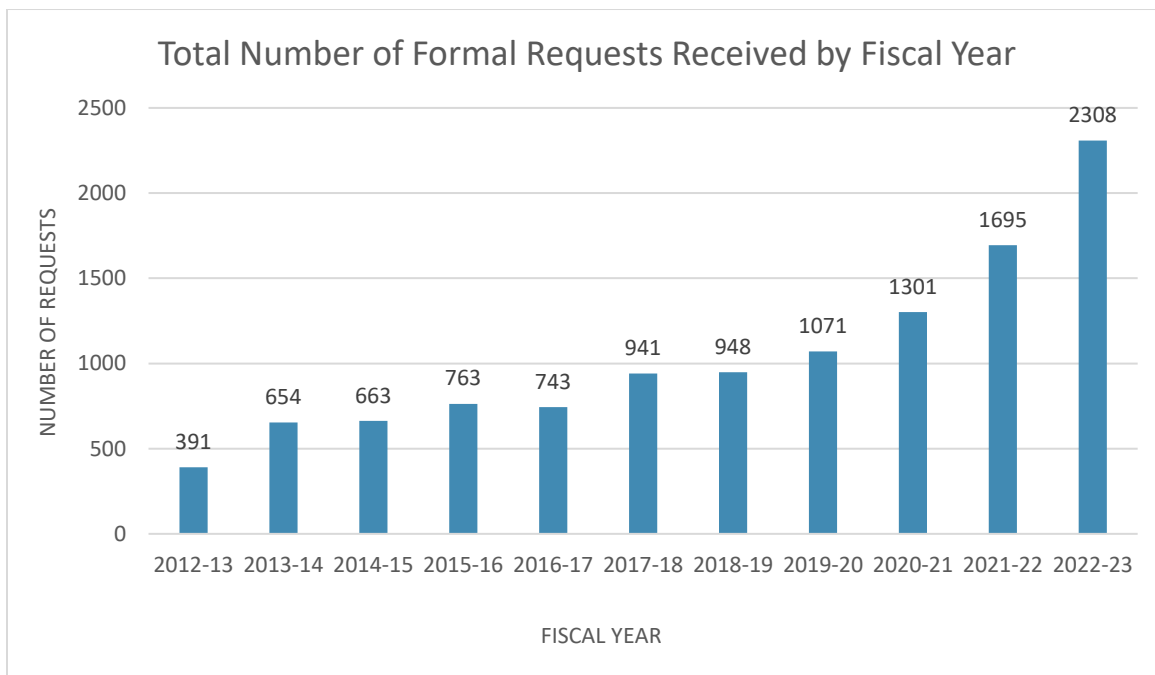
A formal request is a written request made under the *Privacy Act* to the government institution that controls the record. There is no application fee and the Department has 30 calendar days to respond. If extensions are required, applicants are notified in writing. The majority of requests are from Veterans seeking the records that VAC holds such as details of their applications and medical records.

The following table provides a historical view of key data on the formal privacy requests we have processed.

| Fiscal year | Number of requests received | Number of requests carried over from the previous | Total caseload | Number of closed requests | Number of pages reviewed for closed files | Number of pages disclosed | Number of requests carried over to the next FY |
|-------------|-----------------------------|---|----------------|---------------------------|---|---------------------------|--|
| 2022-23 | 2308 | 149 | 2457 | 2256 | 357,910 | 356,484 | 201 |
| 2021-22 | 1695 | 196 | 1891 | 1742 | 439,405 | 437,099 | 149 |

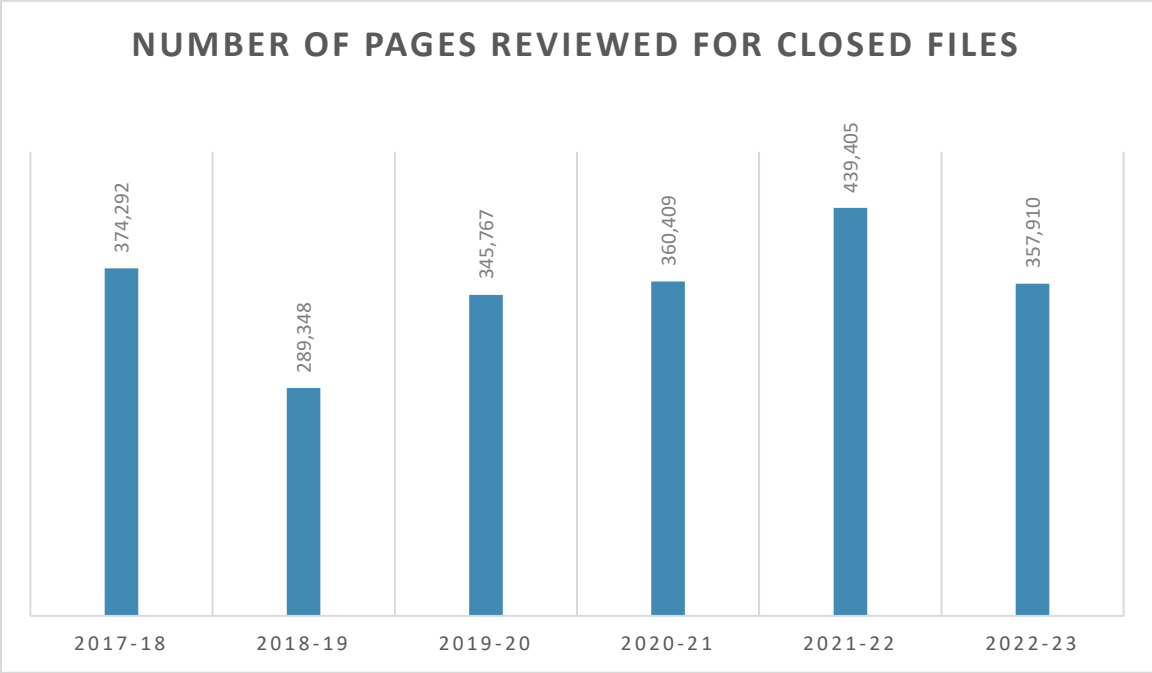
| | | | | | | | |
|---------|------|-----|------|------|---------|---------|-----|
| 2020-21 | 1301 | 181 | 1482 | 1286 | 360,409 | 291,782 | 196 |
| 2019-20 | 1071 | 120 | 1191 | 1010 | 345,767 | 285,797 | 181 |
| 2018-19 | 948 | 93 | 1041 | 922 | 289,348 | 245,377 | 119 |
| 2017-18 | 941 | 99 | 1040 | 952 | 374,292 | 346,931 | 93 |

Between April 1, 2022, and March 31, 2023, the Department received 2308 formal requests for information under the *Privacy Act*, which represents an increase of 36% over 2021-2022 when VAC received 1695 requests. The number of requests we receive each year has been steadily increasing over time as demonstrated in the chart below. We note the most significant increase occurring during this reporting period.



With the 2308 requests received, and the 149 requests carried forward from previous reporting periods (148 from 2021-22, 1 from 2020-21), we had 2457 requests to complete. We closed 2256 of these requests during the reporting period (this includes 147 of the requests from 2021-22 and the 1 from 2020-21). We carried forward 201 (200 from the current reporting year and 1 from 2021-22) into the 2023-24 reporting year (169 were within the legislated timeline, and 32 were beyond the legislated timeline).

We also note a decrease in the number of pages processed this year - 357,910 pages -compared to last year in which we processed 439,405 pages, as shown in the chart below. This is an interesting change given that we experienced an increase of 36% in the number of requests received. Of note is the amount of administrative work attached to processing a request, which is in addition to the pages reviewed.

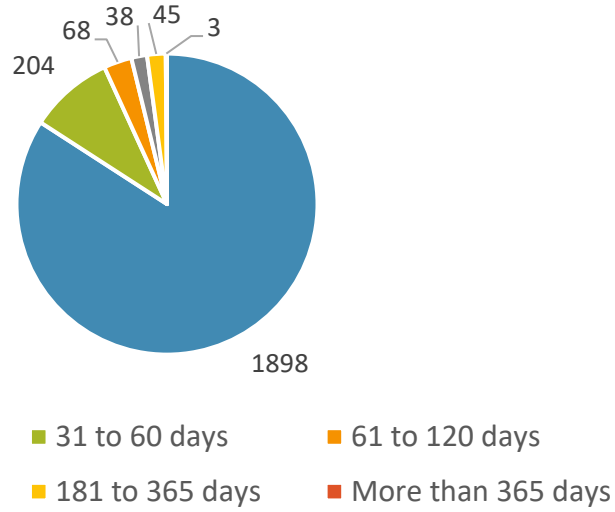


Completion times

We completed 2007 requests (89%) within the legislated timeline, which is an improvement from last year in which our completion rate was 75%. We had 249 requests that were closed past the legislated timeline. The reasons for the past due requests included interference with operations/workload (159), external consultation (1), internal consultation (1) and other (88). The following chart shows the number of completed requests broken down by completion times.

What is also important is the fact that completion times were impacted by Hurricane Fiona which shut down government operations in Charlottetown, PEI, for a period (10 business days). The largest impact was due to power outages as 90% of Prince Edward Island had no power.

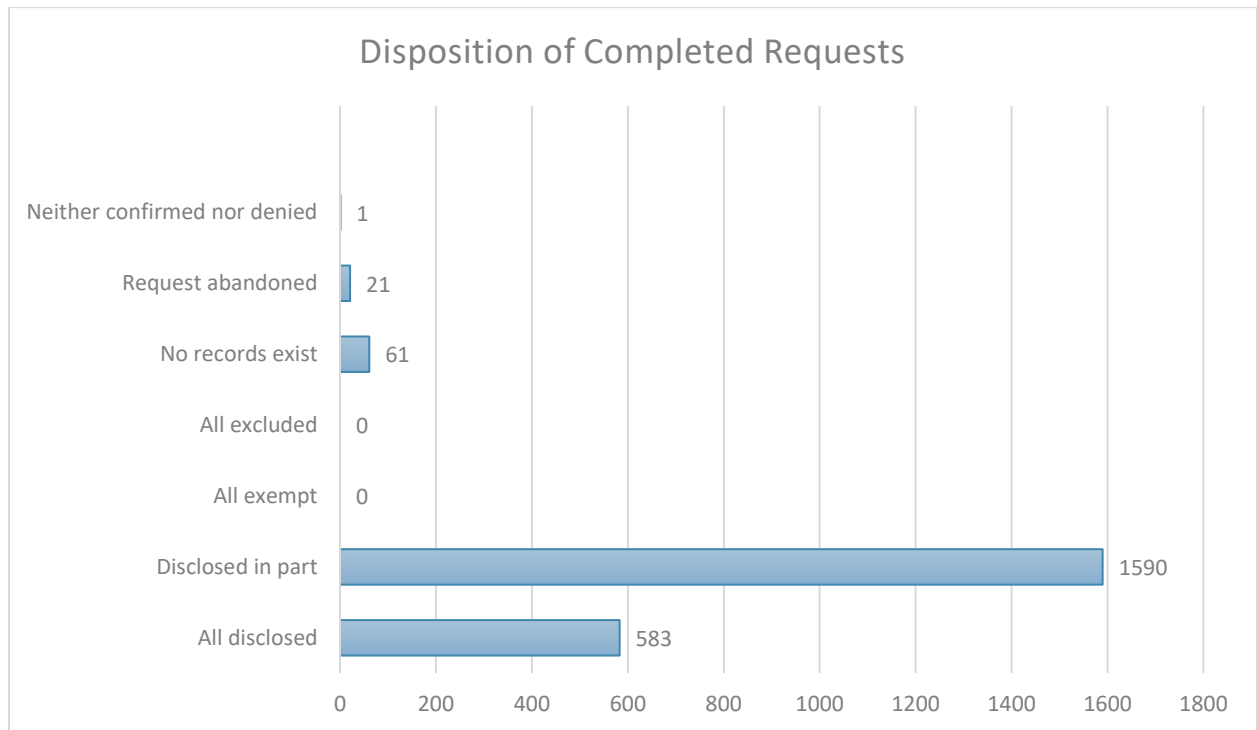
Completion Times for Formal Requests



Disposition of requests

Of the closed requests, 96% of the records were disclosed (583 were disclosed in full (27%) and 1590 were disclosed in part (73%)). The following chart shows the breakdown of the disposition of completed requests.

Disposition of Completed Requests



Channel of requests

During this reporting period, we received 2308 requests, of which 1718 were submitted by email, 504 were submitted online, 64 were by mail, 15 were by fax, and 7 were by phone.

Exemptions invoked

Canadians have a right of access to their personal information. The *Privacy Act*, however, identifies specific exemptions for which the need for confidentiality of certain information is recognized. An exemption is a provision under the Act that authorizes the non-disclosure of certain personal information in response to a privacy request. We applied exemptions to 1610 requests. The most frequently applied exemption was section 26, which allows for information to be withheld that relates to any individual other than the individual who made the request. This exemption ensures that the personal information of anyone, other than the requester, is protected. VAC invoked 1584 exemptions under section 26 in 2022-2023.

Exclusions cited

Sections 69 and 70 of the *Privacy Act* set out exclusions. An exclusion is information to which the Act does not apply. Examples of exclusions include published material, material available for purchase by the public, material placed in the Library and Archives of Canada or confidences of the King's Privy Council for Canada. No exclusions were applied by VAC under sections 69 and 70.

Format of information released

Of the formal requests processed, 1408 were released as electronic copies, 765 were released in paper format, and four audio records (totaling 130 minutes) were released.

Translation

VAC received one request for translation (French to English).

Extensions

During the reporting period, we took 221 extensions. The majority (187) required a review of a large volume of pages, 32 involved records that were difficult to obtain, 1 was for a large volume of requests, and 1 was for translation purposes. Under *the Privacy Act*, 30 days is the largest extension that can be granted.

Consultations Received from Other Government of Canada Institutions and Organizations

VAC did not receive any requests for consultations from other government institutions or organizations during the reporting period.

Public Interest Disclosures/Disclosure under subsections 8(2) and 8(5)

Subsection 8(2) of the *Privacy Act* provides limited and specific circumstances under which institutions may disclose personal information without an individual's consent.

VAC had 1 disclosure of personal information pursuant to paragraph 8(2)(e), during the 2022-23 reporting period.

Paragraph 8(2)(m) allows institutions to release personal information if either the public interest in disclosure clearly outweighs any invasion of privacy that could result from disclosure, or if the disclosure would clearly benefit the individual to whom the information relates. There were no disclosures under paragraph 8(2)(m) or subsection 8(5).

Requests for correction of personal information and notations

Under the *Privacy Act*, individuals are entitled to request correction and notation of personal information when they believe there is an error or an omission. We did not receive any formal requests for corrections and notations of personal information collected by VAC during the reporting period.

Complaints and investigations notices received

Requesters are entitled to file a complaint with the Office of the Privacy Commissioner of Canada regarding the processing of their request. The Privacy Commissioner of Canada is an Officer of Parliament who receives complaints and independently investigates them.

The Privacy and IM Policy Unit received 10 OPC complaints during the 2022-23 fiscal year (all related to collection, use and disclosure). Three are on-going, 7 were closed as “resolved at early resolution”, 1 was closed as “not well-founded”, and the remaining 2 were closed as “well-founded”. As of March 31, 2022, there was also 1 on-going complaint (for compliance) from 2020-2021 and 2 on-going complaints (for use and disclosure) from 2021-22.

VAC received 3 new complaints on the privacy requests we processed. These complaints were carried over into the next fiscal year.

Privacy Impact Assessments and PIBs

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

In accordance with the Treasury Board Secretariat’s Directive on Privacy Impact Assessment, the Department conducts Privacy Impact Assessments (PIAs) for new or substantially modified programs or activities involving personal information, including when services are contracted to another party. Initiatives are assessed and, when possible privacy concerns are identified, mitigation strategies are developed to eliminate or lower the risk(s).

In recent years, VAC has seen less activity requiring PIAs, but has been using “Privacy, Information Management and Information Technology Security Needs Determination Reports” more and more to identify vulnerabilities in instances where PIAs are not required. These reports assess security, privacy, and information management risks on new initiatives, projects, and IT systems, allowing to mitigate any risks prior to implementation.

During the 2022–2023 fiscal year, VAC submitted one Privacy Impact Assessment (PIA) Addendums to the Office of the Privacy Commissioner (OPC) and Treasury Board Secretariat (TBS). The following program was assessed:

- Health Care Benefits and Services

In 2010, a Health Care Benefits and Services PIA was first completed where risks and mitigation measures were documented. As the health care and benefits evolved to meet the needs of Veterans and their families, PIA addendums were completed in 2012 and in 2015. In 2022, a new addendum analyzed the addition of Mental Health Benefits (MHB) to the Health Care Benefits Program. The new MHB provides coverage for specific mental health care supports while the applicant is awaiting a VAC Disability Benefit decision for the most common service-related mental health conditions.

In addition to the one PIA Addendum, 23 Privacy, Information Management and Information Technology Security Needs Determination Reports were completed to determine if new or amended programs or projects required a full PIA. No other initiatives were identified as requiring a full PIA or addendum.

Privacy Breaches

A privacy breach involves the Improper or unauthorized collection, use, disclosure, retention and/or disposal of personal information.

During the 2021-2022 fiscal year, we had 1 material privacy breach reported to TBS, and the OPC. And we had a total of 77 non-material privacy breaches.

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

Costs for administering the *Privacy Act*

A total of 10 full-time FTEs were dedicated primarily to processing requests under the administration of the *Privacy Act* in 2021-2022. To effectively manage workload, a number of employees in the VAC ATIP Office are involved in both the administration of the *Access to Information Act* and the *Privacy Act*. 7 FTEs in the Privacy and IM Policy and Governance Unit coordinated privacy impact assessments, privacy breach investigations, training, guidance, and recommendations to ensure privacy and information management compliance.

The VAC ATIP Office spent a total of \$1,928,877 to administer the *Privacy Act* during the reporting period, of which \$1,862,800 was spent on salaries, \$22,380 for other administrative costs, and \$43,697 on overtime costs were incurred in 2022-2023.

The costs identified above for administering the *Privacy Act* pertain only to expenses directly related to the VAC ATIP Office. They do not include time spent by program areas in the branches to compile and review records for access requests.

Closing Remarks

We work to provide Veterans, their families and Canadians with the information they want and we strive to find ways to be faster and more efficient in this endeavour. For this reason, we are always looking for ways to improve so that we can provide better service to Canadians. This means looking at our challenges, and finding opportunities for improvement, which is what we did in 2022-23, and will continue to do in 2023-24. Our focus, and commitment, will continue to be to:

- provide the best possible service to our clients;
- build public trust through accurate and relevant searches of records;
- be nimble and innovative in how we work to ensure continuous and seamless services (even in difficult times);
- leverage digital technology to gain efficiencies; and
- support the Government of Canada's commitment to be open and transparent with Canadians.

As we work in a new hybrid workplace model, we remain committed to adapting and providing the best possible service to Veterans, their families and Canadians, and will continue to look for ways to do better in this endeavor.

Annex A - Office of the Veterans Ombudsman

Annual Report on the Administration of the *Privacy Act*

Introduction:

The Office of the Veterans Ombud (OVO) takes the responsibility to protect the privacy of Veterans and their families very seriously. Privacy is a fundamental right in Canada. The *Privacy Act* operates to protect Canadians with respect to their personal information held by the Government of Canada.

The *Act* provides Canadian citizens and permanent residents with the general right to access and seek correction of their personal information that is held by the federal government. Under the *Privacy Act*, “personal information” is defined as “information about an identifiable individual that is recorded in any form.” Examples include information about national or ethnic origin, colour, religion, age or marital status of an individual; education or medical, criminal, financial or employment history of an individual; and any identifying number, symbol or other particular identifier assigned to an individual.

The *Act* also provides the framework for the collection, accuracy, use, disclosure, retention and disposition of personal information. Personal information may only be used for the purposes allowed by the *Privacy Act* and may only be disclosed in accordance with the legislation.

This annual report on the administration to the *Privacy Act* describes how the Office of the Veterans Ombud fulfilled their responsibilities under the *Privacy Act* during the fiscal year April 1, 2022 to March 31, 2023. This report is being prepared to be tabled in Parliament in accordance with section 72 of the *Privacy Act*.

The mandate of the OVO, found in the [Order in Council P.C. 2007-530](#), shall be:

- to review and address complaints by clients [of Veterans Affairs Canada] and their representatives arising from the application of the provisions of the [Veterans Bill of Rights](#);
- to identify and review emerging and systemic issues related to programs and services provided or administered by the Department or by third parties on the Department's behalf that impact negatively on clients;
- to review and address complaints by clients [of Veterans Affairs Canada] and their representatives related to programs and services provided or administered by the Department or by third parties on the Department's behalf, including individual decisions related to the programs and services for which there is no right of appeal to the (Veterans Review and Appeal) Board;
- to review systemic issues related to the (Veterans Review and Appeal) Board; and
- to facilitate access by stakeholders to programs and services by providing them with information and referrals.

Organizational Structure:

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

The OVO's Access to Information and Privacy Unit in Charlottetown, Prince Edward Island ensures that the Office's responsibilities under both acts are met. Processing of requests is centralized within the unit. The Unit consists of the Director - Veterans Intervention Services, and the Knowledge Management Coordinator. These staff members were assigned to the administration of both acts on a part time (as required) basis during the 2022-23 reporting period, which represents 0.3 of an FTE.

The main activities of the OVO ATIP Unit include:

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

Delegation Order:

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

Highlights of the Statistical Report 2022-23:

- All 6 Privacy requests received were responded to within the legislated timelines
- There were no extensions of timelines
- There was no consultation with other institutions

The completed statistical report for 2022-23 is included.

Training and Awareness:

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

Policies, Guidelines, Procedures and Initiatives

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

The OVO also maintained and monitored current Access to Information policies, guidelines and procedures during the 2022-23 reporting period.

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

In the 2022-23 reporting period, OVO received no complaints in relation to privacy requests. No complaints were carried over from 2021-22. The OVO had no audits or investigations concluded during the reporting period.

Monitoring Compliance:

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

Material Privacy Breaches:

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

Privacy Impact Assessments:

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

Public Interest Disclosures:

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

Cost to operate program: \$22,200



Statistical Report on the *Privacy Act*

Name of institution: Office of the Veterans Ombud

Reporting period: 2022/04/01 to 2023/03/31

Section 1: Requests Under the *Privacy Act*

1.1 Number of requests received

| | | Number of Requests |
|---|---|--------------------|
| Received during reporting period | | 6 |
| Outstanding from previous reporting periods | | 0 |
| • Outstanding from previous reporting period | 0 | |
| • Outstanding from more than one reporting period | 0 | |
| Total | | 6 |
| Closed during reporting period | | 6 |
| Carried over to next reporting period | | 0 |
| • Carried over within legislated timeline | 0 | |
| • Carried over beyond legislated timeline | 0 | |

1.2 Channels of requests

| Source | Number of Requests |
|--------------|--------------------|
| Online | 4 |
| E-mail | 2 |
| Mail | 0 |
| In person | 0 |
| Phone | 0 |
| Fax | 0 |
| Total | 6 |

Section 2: Informal requests

2.1 Number of informal requests

| | | Number of Requests |
|---|---|--------------------|
| Received during reporting period | | 0 |
| Outstanding from previous reporting periods | | 0 |
| • Outstanding from previous reporting period | 0 | |
| • Outstanding from more than one reporting period | 0 | |
| Total | | 0 |
| Closed during reporting period | | 0 |
| Carried over to next reporting period | | 0 |

2.2 Channels of informal requests

| Source | Number of Requests |
|--------------|--------------------|
| Online | 0 |
| E-mail | 0 |
| Mail | 0 |
| In person | 0 |
| Phone | 0 |
| Fax | 0 |
| Total | 0 |

2.3 Completion time of informal requests

| Completion Time | | | | | | | |
|-----------------|---------------|---------------|----------------|-----------------|-----------------|--------------------|-------|
| 1 to 15 Days | 16 to 30 Days | 31 to 60 Days | 61 to 120 Days | 121 to 180 Days | 181 to 365 Days | More Than 365 Days | Total |
| 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

2.4 Pages released informally

| Less Than 100 Pages Released | | 100-500 Pages Released | | 501-1000 Pages Released | | 1001-5000 Pages Released | | More Than 5000 Pages Released | |
|------------------------------|----------------|------------------------|----------------|-------------------------|----------------|--------------------------|----------------|-------------------------------|----------------|
| Number of Requests | Pages Released | Number of Requests | Pages Released | Number of Requests | Pages Released | Number of Requests | Pages Released | Number of Requests | Pages Released |
| 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Section

3.1 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 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Disclosed in part | 0 | 3 | 0 | 0 | 0 | 0 | 0 | 3 |
| All exempted | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| All excluded | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| No records exist | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 3 |
| Request abandoned | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Neither confirmed nor denied | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 3 | 3 | 0 | 0 | 0 | 0 | 0 | 6 |

3.2 Exemptions

| Section | Number of Requests | Section | Number of Requests | Section | Number of Requests |
|----------|--------------------|---------------|--------------------|---------|--------------------|
| 18(2) | 0 | 22(1)(a)(i) | 0 | 23(a) | 0 |
| 19(1)(a) | 0 | 22(1)(a)(ii) | 0 | 23(b) | 0 |
| 19(1)(b) | 0 | 22(1)(a)(iii) | 0 | 24(a) | 0 |
| 19(1)(c) | 0 | 22(1)(b) | 0 | 24(b) | 0 |
| 19(1)(d) | 0 | 22(1)(c) | 0 | 25 | 1 |
| 19(1)(e) | 0 | 22(2) | 0 | 26 | 3 |
| 19(1)(f) | 0 | 22.1 | 0 | 27 | 0 |
| 20 | 0 | 22.2 | 0 | 27.1 | 0 |
| 21 | 0 | 22.3 | 0 | 28 | 0 |
| | | 22.4 | 0 | | |

3.3 Exclusions

| Section | Number of Requests | Section | Number of Requests | Section | Number of Requests |
|----------|--------------------|----------|--------------------|----------|--------------------|
| 69(1)(a) | 0 | 70(1) | 0 | 70(1)(d) | 0 |
| 69(1)(b) | 0 | 70(1)(a) | 0 | 70(1)(e) | 0 |
| 69.1 | 0 | 70(1)(b) | 0 | 70(1)(f) | 0 |
| | | 70(1)(c) | 0 | 70.1 | 0 |

3.4 Format of information released

| Paper | Electronic | | | | Other |
|-------|------------|----------|-------|-------|-------|
| | E-record | Data set | Video | Audio | |
| 0 | 3 | 0 | 0 | 0 | 0 |

3.5 Complexity

3.5.1 Relevant pages processed and disclosed for paper and e-record formats

| Number of Pages Processed | Number of Pages Disclosed | Number of Requests |
|---------------------------|---------------------------|--------------------|
| 483 | 483 | 3 |

3.5.2 Relevant pages processed by request disposition for paper and e-record formats by size of requests

| Disposition | Less Than 100 Pages Processed | | 100-500 Pages Processed | | 501-1000 Pages Processed | | 1001-5000 Pages Processed | | More Than 5000 Pages Processed | |
|------------------------------|-------------------------------|-----------------|-------------------------|-----------------|--------------------------|-----------------|---------------------------|-----------------|--------------------------------|-----------------|
| | Number of Requests | Pages Processed | Number of Requests | Pages Processed | Number of Requests | Pages Processed | Number of Requests | Pages Processed | Number of Requests | Pages Processed |
| All disclosed | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Disclosed in part | 1 | 69 | 2 | 414 | 0 | 0 | 0 | 0 | 0 | 0 |
| All exempted | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| All excluded | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Request abandoned | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Neither confirmed nor denied | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 1 | 69 | 2 | 414 | 0 | 0 | 0 | 0 | 0 | 0 |

3.5.3 Relevant minutes processed and disclosed for audio formats

| Number of Minutes Processed | Number of Minutes Disclosed | Number of Requests |
|-----------------------------|-----------------------------|--------------------|
| 0 | 0 | 0 |

3.5.4 Relevant minutes processed per request disposition for audio formats by size of requests

| Disposition | Less than 60 Minutes processed | | 60-120 Minutes processed | | More than 120 Minutes processed | |
|------------------------------|--------------------------------|-------------------|--------------------------|-------------------|---------------------------------|-------------------|
| | Number of requests | Minutes Processed | Number of requests | Minutes Processed | Number of requests | Minutes Processed |
| All disclosed | 0 | 0 | 0 | 0 | 0 | 0 |
| Disclosed in part | 0 | 0 | 0 | 0 | 0 | 0 |
| All exempted | 0 | 0 | 0 | 0 | 0 | 0 |
| All excluded | 0 | 0 | 0 | 0 | 0 | 0 |
| Request abandoned | 0 | 0 | 0 | 0 | 0 | 0 |
| Neither confirmed nor denied | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 0 | 0 | 0 | 0 | 0 | 0 |

3.5.5 Relevant minutes processed and disclosed for video formats

| Number of Minutes Processed | Number of Minutes Disclosed | Number of Requests |
|-----------------------------|-----------------------------|--------------------|
| 0 | 0 | 0 |

3.5.6 Relevant minutes processed per request disposition for video formats by size of requests

| Disposition | Less than 60 Minutes processed | | 60-120 Minutes processed | | More than 120 Minutes processed | |
|------------------------------|--------------------------------|-------------------|--------------------------|-------------------|---------------------------------|-------------------|
| | Number of requests | Minutes Processed | Number of requests | Minutes Processed | Number of requests | Minutes Processed |
| All disclosed | 0 | 0 | 0 | 0 | 0 | 0 |
| Disclosed in part | 0 | 0 | 0 | 0 | 0 | 0 |
| All exempted | 0 | 0 | 0 | 0 | 0 | 0 |
| All excluded | 0 | 0 | 0 | 0 | 0 | 0 |
| Request abandoned | 0 | 0 | 0 | 0 | 0 | 0 |
| Neither confirmed nor denied | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 0 | 0 | 0 | 0 | 0 | 0 |

3.5.7 Other complexities

| Disposition | Consultation Required | Legal Advice Sought | Interwoven Information | Other | Total |
|------------------------------|-----------------------|---------------------|------------------------|----------|----------|
| All disclosed | 0 | 0 | 0 | 0 | 0 |
| Disclosed in part | 0 | 0 | 0 | 0 | 0 |
| All exempted | 0 | 0 | 0 | 0 | 0 |
| All excluded | 0 | 0 | 0 | 0 | 0 |
| Request abandoned | 0 | 0 | 0 | 0 | 0 |
| Neither confirmed nor denied | 0 | 0 | 0 | 0 | 0 |
| Total | 0 | 0 | 0 | 0 | 0 |

3.6 Closed requests

3.6.1 Number of requests closed within legislated timelines

| | |
|---|-----|
| Number of requests closed within legislated timelines | 6 |
| Percentage of requests closed within legislated timelines (%) | 100 |

3.7 Deemed refusals

3.7.1 Reasons for not meeting legislated timelines

| Number of requests closed past the legislated timelines | Principal Reason | | | |
|---|---|-----------------------|-----------------------|-------|
| | Interference with operations / Workload | External Consultation | Internal Consultation | Other |
| 0 | 0 | 0 | 0 | 0 |

3.7.2 Request closed beyond legislated timelines (including any extension taken)

| Number of days past legislated timelines | Number of requests past legislated timeline where no extension was taken | Number of requests past legislated timeline where an extension was taken | Total |
|--|--|--|----------|
| 1 to 15 days | 0 | 0 | 0 |
| 16 to 30 days | 0 | 0 | 0 |
| 31 to 60 days | 0 | 0 | 0 |
| 61 to 120 days | 0 | 0 | 0 |
| 121 to 180 days | 0 | 0 | 0 |
| 181 to 365 days | 0 | 0 | 0 |
| More than 365 days | 0 | 0 | 0 |
| Total | 0 | 0 | 0 |

3.8 Requests for translation

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

Section 4: Disclosures Under Subsections 8(2) and 8(5)

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

Section 5: Requests for Correction of Personal Information and Notations

| Disposition for Correction Requests Received | Number |
|--|----------|
| Notations attached | 0 |
| Requests for correction accepted | 0 |
| Total | 0 |

Section 6: Extensions

6.1 Reasons for extensions

| Number of extensions taken | 15(a)(i) Interference with operations | | | |
|----------------------------|---|-----------------------|--------------------------|--|
| | Further review required to determine exemptions | Large volume of pages | Large volume of requests | Documents are difficult to obtain |
| 0 | 0 | 0 | 0 | 0 |
| | 15 (a)(ii) Consultation | | | 15(b) Translation purposes or conversion |
| | Cabinet ConfidenceSection (Section 70) | External | Internal | |
| | 0 | 0 | 0 | 0 |

6.2 Length of extensions

| Length of Extensions | 15(a)(i) Interference with operations | | | |
|----------------------|---|-----------------------|--------------------------|-----------------------------------|
| | Further review required to determine exemptions | Large volume of pages | Large volume of requests | Documents are difficult to obtain |
| 1 to 15 days | 0 | 0 | 0 | 0 |
| 16 to 30 days | 0 | 0 | 0 | 0 |
| 31 days or greater | | | | |
| Total | 0 | 0 | 0 | 0 |

| Length of Extensions | 15 (a)(ii) Consultation | | | 15(b) Translation purposes or conversion |
|----------------------|---|----------|----------|--|
| | Cabinet Confidence Section (Section 70) | External | Internal | |
| 1 to 15 days | 0 | 0 | 0 | 0 |
| 16 to 30 days | 0 | 0 | 0 | 0 |
| 31 days or greater | | | | 0 |
| Total | 0 | 0 | 0 | 0 |

Section 7: Consultations Received From Other Institutions and Organizations

7.1 Consultations

| Consultations | Other Government of Canada Institutions | Number of Pages to Review | Other Organizations | Number of Pages to Review |
|--|---|---------------------------|---------------------|---------------------------|
| Received during the reporting period | 0 | 0 | 0 | 0 |
| Outstanding from the previous reporting period | 0 | 0 | 0 | 0 |
| Total | 0 | 0 | 0 | 0 |
| Closed during the reporting period | 0 | 0 | 0 | 0 |
| Carried over within negotiated timelines | 0 | 0 | 0 | 0 |
| Carried over beyond negotiated timelines | 0 | 0 | 0 | 0 |

7.2 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 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Disclose in part | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Exempt entirely | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Exclude entirely | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Consult other institution | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Other | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

7.3 Recommendations and completion time for consultations received from other organizations outside the Government of Canada

| 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 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Disclose in part | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Exempt entirely | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Exclude entirely | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Consult other institution | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Other | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Section 8: Completion Time of Consultations on Cabinet Confidences

8.1 Requests with Legal Services

| Number of Days | Fewer Than 100 Pages Processed | | 100-500 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 |

8.2 Requests with Privy Council Office

| Number of Days | Fewer Than 100 Pages Processed | | 100-500 Pages Processed | | 501-1000 Pages Processed | | 1001-5000 Pages Processed | | More than 5000 Pages Processed | |
|----------------|--------------------------------|-----------------|-------------------------|-----------------|--------------------------|-----------------|---------------------------|-----------------|--------------------------------|-----------------|
| | Number of Requests | Pages Disclosed | Number of Requests | Pages Disclosed | Number of Requests | Pages Disclosed | Number of Requests | Pages Disclosed | Number of Requests | Pages Disclosed |
| 1 to 15 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 16 to 30 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 31 to 60 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 61 to 120 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 121 to 180 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 181 to 365 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| More than 365 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Section 9: Complaints and Investigations Notices Received

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

Section 10: Privacy Impact Assessments (PIAs) and Personal Information Banks (PIBs)

10.1 Privacy Impact Assessments

| | |
|--------------------------|---|
| Number of PIAs completed | 0 |
| Number of PIAs modified | 0 |

10.2 Institution-specific and Central Personal Information Banks

| Personal Information Banks | Active | Created | Terminated | Modified |
|----------------------------|----------|----------|------------|----------|
| Institution-specific | 0 | 0 | 0 | 0 |
| Central | 0 | 0 | 0 | 0 |
| Total | 0 | 0 | 0 | 0 |

Section 11: Privacy Breaches

11.1 Material Privacy Breaches reported

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

11.2 Non-Material Privacy Breaches

| | |
|---|---|
| Number of non-material privacy breaches | 2 |
|---|---|

Section 12: Resources Related to the Privacy Act**12.1 Allocated Costs**

| Expenditures | | Amount |
|-----------------------------------|-----|-----------------|
| Salaries | | \$22,200 |
| Overtime | | \$0 |
| Goods and Services | | \$0 |
| • Professional services contracts | \$0 | |
| • Other | \$0 | |
| Total | | \$22,200 |

12.2 Human Resources

| Resources | Person Years Dedicated to Privacy Activities |
|----------------------------------|--|
| Full-time employees | 0.300 |
| Part-time and casual employees | 0.000 |
| Regional staff | 0.000 |
| Consultants and agency personnel | 0.000 |
| Students | 0.000 |
| Total | 0.300 |

Annex B - Delegation Order



Veterans Affairs
Canada

Anciens Combattants
Canada

Privacy Act
Delegation Order

*Loi sur la protection des renseignements
personnels*
Ordonnance de délégation

I, Lawrence MacAulay, Minister of Veterans Affairs Canada, do hereby designate, Pursuant to section 73 of the *Privacy Act*, the officers or employees of Veterans Affairs Canada who hold the positions set out in the attached Delegation Orders to exercise or perform the powers, duties, or functions that have been given to me as head of a government institution under the provisions of the *Privacy Act* as set out in the Delegation Order.

This designation replaces all previous delegation orders.

Je soussigné, Lawrence MacAulay, ministre d'Anciens Combattants Canada, désigne par la présente, conformément à l'article 73 de la *Loi sur la protection des renseignements personnels*, les dirigeants ou les employés d'Anciens Combattants Canada qui occupent les postes indiqués dans les Ordonnances de délégation ci-jointe pour exercer les pouvoirs et les fonctions qui m'ont été conférés en tant que responsable d'une institution fédérale en vertu des dispositions de la *Loi sur la protection des renseignements personnels*, comme indiqué dans l'Ordonnance de délégation.

Cette désignation remplace tous les arrêtés de délégation antérieurs.

The Minister of Veterans Affairs Canada
Ministre, Anciens Combattants Canada

Lawrence MacAulay
Minister of Veterans Affairs
Ministère des Anciens Combattants

Signed in Ottawa, Ontario, Canada this 25th day of March, 2021
Signé à Ottawa, Ontario, Canada ce 25^e jour de mars 2021

Privacy Act and Regulations – Delegated Authorities

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

All powers, duties and functions under the Privacy Act (prior to and following June 21, 2019) and related regulations (prior to and following June 21, 2019)

| Description | Section | Delegated Authority |
|---|---------|--|
| Disclosure for research or statistical purposes | 8(2)(j) | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Ministers • Directors General • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy • Manager, Safety and Security Services • Manager, Litigation Coordination Unit • Case Manager, Field Operations Division |
| Disclosure in the public interest or in the interest of the individual | 8(2)(m) | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management |
| Retention of a record of requests and disclosed records to investigative bodies under section 8(2)(e) of the <i>Privacy Act</i> | 8(4) | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration |

| | | |
|--|------|--|
| | | <ul style="list-style-type: none"> • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy |
| Notice of disclosure under paragraph 8(2)(m) | 8(5) | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management |
| Record of disclosures to be retained | 9(1) | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Ministers • Directors General • Director, Privacy and Information Management |
| Notification of the Privacy Commissioner of any new consistent uses of personal information and ensure use is included in next statement of consistent uses set forth in the Index | 9(4) | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy |
| Personal information to be included in personal information banks | 10 | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management |

| | | |
|--|-------|--|
| | | <ul style="list-style-type: none"> • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy |
| Notice where access requested | 14(a) | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy |
| Giving access to the record | 14(b) | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy • Officer, Access to Information and Privacy |
| Extension of the 30 day time limit to respond to a privacy request | 15 | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management |

| | | |
|---|----------|--|
| | | <ul style="list-style-type: none"> • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy • Officer, Access to Information and Privacy |
| Decision on whether to translate a response to a privacy request in one of the two official languages | 17(2)(b) | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy • Officer, Access to Information and Privacy |
| Decision on whether to convert personal information to an alternate format | 17(3)(b) | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy |
| Decision to refuse to disclose personal information contained in an exempt bank | 18(2) | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management |

| | | |
|--|----|--|
| | | <ul style="list-style-type: none"> • Manager, Access to Information and Privacy |
| Personal information obtained in confidence | 19 | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy |
| Refuse to disclose personal information that may be injurious to federal-provincial affairs | 20 | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy |
| Refuse to disclose personal information that may be injurious to international affairs or the defence of Canada or one of its allies | 21 | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy |

| | | |
|--|------|--|
| Refuse to disclose personal information prepared by an investigative body, information injurious to the enforcement of a law, or information injurious to the security of penal institutions | 22 | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy |
| Refuse to disclose personal information created for the <i>Public Servants Disclosure Protection Act</i> | 22.3 | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management |
| Refuse to disclose personal information prepared by an investigative body for security clearance | 23 | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy |
| Refuse to disclose personal information that was collected by the Canadian Penitentiary Service, the National Parole Service or the National Parole Board while the individual was | 24 | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration |

| | | |
|---|----|--|
| under sentence if the conditions in the section are met | | <ul style="list-style-type: none"> • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy |
| Refuse to disclose personal information which could threaten the safety of individuals | 25 | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy |
| Refuse to disclose personal information about another individual and shall refuse to disclose such information where disclosure is prohibited under section 8 | 26 | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy |
| Refuse to disclose personal information that is subject to solicitor-client privilege | 27 | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management |

| | | |
|---|-------|--|
| | | <ul style="list-style-type: none"> • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy |
| Refuse to disclose personal information relating to the individual's physical or mental health where the disclosure is contrary to the best interests of the individual | 28 | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy |
| Receive notice of investigation by the Privacy Commissioner | 31 | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy |
| Right to make representations to the Privacy Commissioner during an investigation | 33(2) | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy |

| | | |
|---|-------|--|
| | | <ul style="list-style-type: none"> • Team Leader, Access to Information and Privacy |
| Receive Privacy Commissioner's report of findings of an investigation and give notice of action taken | 35(1) | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy |
| Provision of addition personal information to a complainant after receiving a 35(1)(b) notice | 35(4) | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy |
| Receive Privacy Commissioner's report of findings of investigation of exempt bank | 36(3) | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy |

| | | |
|--|----------|--|
| Receive report of Privacy Commissioner's findings after compliance investigation | 37(3) | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy |
| Request that a court hearing, undertaken with respect to certain sections of the Act, be held in the National Capital Region | 51(2)(b) | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management |
| Request and be given right to make representations in section 51 hearings | 51(3) | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management |
| Prepare annual report to Parliament | 72(1) | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Minister, Corporate Services • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management |

Privacy Regulations – Delegated Authorities

| Description | Section | Delegated authority |
|---|-----------|---|
| Retention of personal information requested under paragraph 8(2)(e) | 7 | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Ministers • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management |
| Allow examination of the documents (Reading Room) | 9 | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Ministers • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy • Team Leader, Access to Information and Privacy |
| Notification concerning corrections | 11(2),(4) | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Ministers • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management • Manager, Access to Information and Privacy |
| Correction refused, notation placed on file | 11(4) | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Ministers • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management |

| | | |
|---|-------|---|
| | | <ul style="list-style-type: none"> • Manager, Access to Information and Privacy |
| Disclosure to a medical practitioner or psychologist | 13(1) | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Ministers • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management |
| Examination in presence of medical practitioner or psychologist | 14 | <ul style="list-style-type: none"> • Deputy Minister • Associate Deputy Minister • Assistant Deputy Ministers • Director General, Information Technology, Information Management and Administration • Director, Privacy and Information Management |

Office of the Veterans Ombudsman

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

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

Annex C - Statistical Report



Government
of Canada Gouvernement
du Canada

Statistical Report on the *Privacy Act*

Name of institution: Veterans Affairs Canada

Reporting period: 2022/04/01 to 2023/03/31

Section 1: Requests Under the *Privacy Act*

1.1 Number of requests received

| | | Number of Requests |
|---|-----|--------------------|
| Received during reporting period | | 2308 |
| Outstanding from previous reporting periods | | 149 |
| • Outstanding from previous reporting period | 148 | |
| • Outstanding from more than one reporting period | 1 | |
| Total | | 2457 |
| Closed during reporting period | | 2256 |
| Carried over to next reporting period | | 201 |
| • Carried over within legislated timeline | 169 | |
| • Carried over beyond legislated timeline | 32 | |

1.2 Channels of requests

| Source | Number of Requests |
|--------------|--------------------|
| Online | 504 |
| E-mail | 1718 |
| Mail | 64 |
| In person | 0 |
| Phone | 7 |
| Fax | 15 |
| Total | 2308 |

Section 2: Informal requests

2.1 Number of informal requests

| | | Number of Requests |
|---|----|--------------------|
| Received during reporting period | | 54 |
| Outstanding from previous reporting periods | | 48 |
| • Outstanding from previous reporting period | 44 | |
| • Outstanding from more than one reporting period | 4 | |
| Total | | 102 |
| Closed during reporting period | | 97 |
| Carried over to next reporting period | | 5 |

2.2 Channels of informal requests

| Source | Number of Requests |
|--------------|--------------------|
| Online | 14 |
| E-mail | 32 |
| Mail | 8 |
| In person | 0 |
| Phone | 0 |
| Fax | 0 |
| Total | 54 |

2.3 Completion time of informal requests

| Completion Time | | | | | | | |
|-----------------|---------------|---------------|----------------|-----------------|-----------------|--------------------|-------|
| 1 to 15 Days | 16 to 30 Days | 31 to 60 Days | 61 to 120 Days | 121 to 180 Days | 181 to 365 Days | More Than 365 Days | Total |
| 3 | 14 | 11 | 14 | 9 | 19 | 27 | 97 |

2.4 Pages released informally

| Less Than 100 Pages Released | | 100-500 Pages Released | | 501-1000 Pages Released | | 1001-5000 Pages Released | | More Than 5000 Pages Released | |
|------------------------------|----------------|------------------------|----------------|-------------------------|----------------|--------------------------|----------------|-------------------------------|----------------|
| Number of Requests | Pages Released | Number of Requests | Pages Released | Number of Requests | Pages Released | Number of Requests | Pages Released | Number of Requests | Pages Released |
| 56 | 1486 | 33 | 6921 | 7 | 5070 | 1 | 1742 | 0 | 0 |

Section 3: Requests Closed During the Reporting Period

3.1 Disposition and completion time

| Disposition of Requests | Completion Time | | | | | | | |
|------------------------------|-----------------|---------------|---------------|----------------|-----------------|-----------------|--------------------|-------------|
| | 1 to 15 Days | 16 to 30 Days | 31 to 60 Days | 61 to 120 Days | 121 to 180 Days | 181 to 365 Days | More Than 365 Days | Total |
| All disclosed | 220 | 329 | 28 | 5 | 1 | 0 | 0 | 583 |
| Disclosed in part | 370 | 911 | 164 | 61 | 37 | 44 | 3 | 1590 |
| All exempted | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| All excluded | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| No records exist | 25 | 23 | 10 | 2 | 0 | 1 | 0 | 61 |
| Request abandoned | 13 | 6 | 2 | 0 | 0 | 0 | 0 | 21 |
| Neither confirmed nor denied | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 1 |
| Total | 628 | 1270 | 204 | 68 | 38 | 45 | 3 | 2256 |

3.2 Exemptions

| Section | Number of Requests | Section | Number of Requests | Section | Number of Requests |
|----------|--------------------|---------------|--------------------|---------|--------------------|
| 18(2) | 0 | 22(1)(a)(i) | 0 | 23(a) | 0 |
| 19(1)(a) | 0 | 22(1)(a)(ii) | 0 | 23(b) | 0 |
| 19(1)(b) | 0 | 22(1)(a)(iii) | 0 | 24(a) | 0 |
| 19(1)(c) | 0 | 22(1)(b) | 3 | 24(b) | 0 |
| 19(1)(d) | 0 | 22(1)(c) | 0 | 25 | 11 |
| 19(1)(e) | 0 | 22(2) | 0 | 26 | 1584 |
| 19(1)(f) | 0 | 22.1 | 0 | 27 | 9 |
| 20 | 0 | 22.2 | 0 | 27.1 | 0 |
| 21 | 0 | 22.3 | 0 | 28 | 3 |
| | | 22.4 | 0 | | |

3.3 Exclusions

| Section | Number of Requests | Section | Number of Requests | Section | Number of Requests |
|----------|--------------------|----------|--------------------|----------|--------------------|
| 69(1)(a) | 0 | 70(1) | 0 | 70(1)(d) | 0 |
| 69(1)(b) | 0 | 70(1)(a) | 0 | 70(1)(e) | 0 |
| 69.1 | 0 | 70(1)(b) | 0 | 70(1)(f) | 0 |
| | | 70(1)(c) | 0 | 70.1 | 0 |

3.4 Format of information released

| Paper | Electronic | | | Other |
|-------|------------|----------|-------|-------|
| | E-record | Data set | Video | |
| 765 | 1408 | 0 | 0 | 4 |

3.5 Complexity

3.5.1 Relevant pages processed and disclosed for paper and e-record formats

| Number of Pages Processed | Number of Pages Disclosed | Number of Requests |
|---------------------------|---------------------------|--------------------|
| 357910 | 356484 | 2195 |

3.5.2 Relevant pages processed by request disposition for paper and e-record formats by size of requests

| Disposition | Less Than 100 Pages Processed | | 100-500 Pages Processed | | 501-1000 Pages Processed | | 1001-5000 Pages Processed | | More Than 5000 Pages Processed | |
|------------------------------|-------------------------------|-----------------|-------------------------|-----------------|--------------------------|-----------------|---------------------------|-----------------|--------------------------------|-----------------|
| | Number of Requests | Pages Processed | Number of Requests | Pages Processed | Number of Requests | Pages Processed | Number of Requests | Pages Processed | Number of Requests | Pages Processed |
| All disclosed | 554 | 10219 | 25 | 5142 | 2 | 1125 | 2 | 4281 | 0 | 0 |
| Disclosed in part | 1113 | 39002 | 301 | 64339 | 89 | 63953 | 85 | 157286 | 2 | 11655 |
| All exempted | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| All excluded | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Request abandoned | 19 | 58 | 1 | 132 | 1 | 718 | 0 | 0 | 0 | 0 |
| Neither confirmed nor denied | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 1687 | 49279 | 327 | 69613 | 92 | 65796 | 87 | 161567 | 2 | 11655 |

3.5.3 Relevant minutes processed and disclosed for audio formats

| Number of Minutes Processed | Number of Minutes Disclosed | Number of Requests |
|-----------------------------|-----------------------------|--------------------|
| 130 | 130 | 4 |

3.5.4 Relevant minutes processed per request disposition for audio formats by size of requests

| Disposition | Less than 60 Minutes processed | | 60-120 Minutes processed | | More than 120 Minutes processed | |
|------------------------------|--------------------------------|-------------------|--------------------------|-------------------|---------------------------------|-------------------|
| | Number of requests | Minutes Processed | Number of requests | Minutes Processed | Number of requests | Minutes Processed |
| All disclosed | 2 | 29 | 1 | 62 | 0 | 0 |
| Disclosed in part | 1 | 39 | 0 | 0 | 0 | 0 |
| All exempted | 0 | 0 | 0 | 0 | 0 | 0 |
| All excluded | 0 | 0 | 0 | 0 | 0 | 0 |
| Request abandoned | 0 | 0 | 0 | 0 | 0 | 0 |
| Neither confirmed nor denied | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 3 | 68 | 1 | 62 | 0 | 0 |

3.5.5 Relevant minutes processed and disclosed for video formats

| Number of Minutes Processed | Number of Minutes Disclosed | Number of Requests |
|-----------------------------|-----------------------------|--------------------|
| 0 | 0 | 0 |

3.5.6 Relevant minutes processed per request disposition for video formats by size of requests

| Disposition | Less than 60 Minutes processed | | 60-120 Minutes processed | | More than 120 Minutes processed | |
|------------------------------|--------------------------------|-------------------|--------------------------|-------------------|---------------------------------|-------------------|
| | Number of requests | Minutes Processed | Number of requests | Minutes Processed | Number of requests | Minutes Processed |
| All disclosed | 0 | 0 | 0 | 0 | 0 | 0 |
| Disclosed in part | 0 | 0 | 0 | 0 | 0 | 0 |
| All exempted | 0 | 0 | 0 | 0 | 0 | 0 |
| All excluded | 0 | 0 | 0 | 0 | 0 | 0 |
| Request abandoned | 0 | 0 | 0 | 0 | 0 | 0 |
| Neither confirmed nor denied | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 0 | 0 | 0 | 0 | 0 | 0 |

3.5.7 Other complexities

| Disposition | Consultation Required | Legal Advice Sought | Interwoven Information | Other | Total |
|------------------------------|-----------------------|---------------------|------------------------|----------|----------|
| All disclosed | 0 | 0 | 0 | 0 | 0 |
| Disclosed in part | 0 | 1 | 0 | 0 | 1 |
| All exempted | 0 | 0 | 0 | 0 | 0 |
| All excluded | 0 | 0 | 0 | 0 | 0 |
| Request abandoned | 0 | 0 | 0 | 0 | 0 |
| Neither confirmed nor denied | 0 | 0 | 0 | 0 | 0 |
| Total | 0 | 1 | 0 | 0 | 1 |

3.6 Closed requests

3.6.1 Number of requests closed within legislated timelines

| | |
|---|-------------|
| Number of requests closed within legislated timelines | 2007 |
| Percentage of requests closed within legislated timelines (%) | 88.96276596 |

3.7 Deemed refusals

3.7.1 Reasons for not meeting legislated timelines

| Number of requests closed past the legislated timelines | Principal Reason | | | |
|---|---|-----------------------|-----------------------|-------|
| | Interference with operations / Workload | External Consultation | Internal Consultation | Other |
| 249 | 159 | 1 | 1 | 88 |

3.7.2 Request closed beyond legislated timelines (including any extension taken)

| Number of days past legislated timelines | Number of requests past legislated timeline where no extension was taken | Number of requests past legislated timeline where an extension was taken | Total |
|--|--|--|------------|
| 1 to 15 days | 78 | 15 | 93 |
| 16 to 30 days | 22 | 11 | 33 |
| 31 to 60 days | 16 | 12 | 28 |
| 61 to 120 days | 13 | 32 | 45 |
| 121 to 180 days | 3 | 17 | 20 |
| 181 to 365 days | 3 | 25 | 28 |
| More than 365 days | 2 | 0 | 2 |
| Total | 137 | 112 | 249 |

3.8 Requests for translation

| Translation Requests | Accepted | Refused | Total |
|----------------------|----------|----------|----------|
| English to French | 0 | 0 | 0 |
| French to English | 1 | 0 | 1 |
| Total | 1 | 0 | 1 |

Section 4: Disclosures Under Subsections 8(2) and 8(5)

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

Section 5: Requests for Correction of Personal Information and Notations

| Disposition for Correction Requests Received | Number |
|--|----------|
| Notations attached | 0 |
| Requests for correction accepted | 0 |
| Total | 0 |

Section 6: Extensions

6.1 Reasons for extensions

| | 15(a)(i) Interference with operations | | | | 15 (a)(ii) Consultation | | | 15(b) Translation purposes or conversion |
|-----------------------------------|--|--------------------------|-----------------------------|--------------------------------------|--|----------|----------|---|
| | Further review required to determine exemptions | Large volume of pages | Large volume of requests | Documents are difficult to obtain | Cabinet ConfidenceSection (Section 70) | External | Internal | |
| Number of extensions taken | 0 | 187 | 1 | 32 | 0 | 0 | 0 | 1 |

6.2 Length of extensions

| Length of Extensions | 15(a)(i) Interference with operations | | | | 15 (a)(ii) Consultation | | | 15(b) Translation purposes or conversion |
|----------------------|--|--------------------------|-----------------------------|--------------------------------------|--|----------|----------|---|
| | Further review required to determine exemptions | Large volume of pages | Large volume of requests | Documents are difficult to obtain | Cabinet ConfidenceSection (Section 70) | External | Internal | |
| 1 to 15 days | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 16 to 30 days | 0 | 187 | 1 | 32 | 0 | 0 | 0 | 1 |
| 31 days or greater | | | | | | | | 0 |
| Total | 0 | 187 | 1 | 32 | 0 | 0 | 0 | 1 |

Section 7: Consultations Received From Other Institutions and Organizations

7.1 Consultations received from other Government of Canada institutions and other organizations

| Consultations | Other Government of Canada Institutions | Number of Pages to Review | Other Organizations | Number of Pages to Review |
|--|---|---------------------------|---------------------|---------------------------|
| Received during the reporting period | 0 | 0 | 0 | 0 |
| Outstanding from the previous reporting period | 0 | 0 | 0 | 0 |
| Total | 0 | 0 | 0 | 0 |
| Closed during the reporting period | 0 | 0 | 0 | 0 |
| Carried over within negotiated timelines | 0 | 0 | 0 | 0 |
| Carried over beyond negotiated timelines | 0 | 0 | 0 | 0 |

7.2 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 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Disclose in part | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Exempt entirely | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Exclude entirely | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Consult other institution | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Other | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

7.3 Recommendations and completion time for consultations received from other organizations outside the Government of Canada

| 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 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Disclose in part | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Exempt entirely | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Exclude entirely | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Consult other institution | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Other | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Section 8: Completion Time of Consultations on Cabinet Confidences

8.1 Requests with Legal Services

| Number of Days | Fewer Than 100 Pages Processed | | 100-500 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 |

8.2 Requests with Privy Council Office

| Number of Days | Fewer Than 100 Pages Processed | | 100-500 Pages Processed | | 501-1000 Pages Processed | | 1001-5000 Pages Processed | | More than 5000 Pages Processed | |
|----------------|--------------------------------|-----------------|-------------------------|-----------------|--------------------------|-----------------|---------------------------|-----------------|--------------------------------|-----------------|
| | Number of Requests | Pages Disclosed | Number of Requests | Pages Disclosed | Number of Requests | Pages Disclosed | Number of Requests | Pages Disclosed | Number of Requests | Pages Disclosed |
| 1 to 15 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 16 to 30 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 31 to 60 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 61 to 120 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 121 to 180 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 181 to 365 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| More than 365 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Section 9: Complaints and Investigations Notices Received

| Section 31 | Section 33 | Section 35 | Court action | Total |
|------------|------------|------------|--------------|-------|
| 13 | 10 | 10 | 0 | 33 |

Section 10: Privacy Impact Assessments (PIAs) and Personal Information Banks (PIBs)

10.1 Privacy Impact Assessments

| | |
|--------------------------|---|
| Number of PIAs completed | 0 |
| Number of PIAs modified | 1 |

10.2 Institution-specific and Central Personal Information Banks

| Personal Information Banks | Active | Created | Terminated | Modified |
|----------------------------|-----------|----------|------------|----------|
| Institution-specific | 44 | 0 | 0 | 0 |
| Central | 0 | 0 | 0 | 0 |
| Total | 44 | 0 | 0 | 0 |

Section 11: Privacy Breaches

11.1 Material Privacy Breaches reported

| | |
|---|---|
| Number of material privacy breaches reported to TBS | 1 |
| Number of material privacy breaches reported to OPC | 1 |

11.2 Non-Material Privacy Breaches

| | |
|---|----|
| Number of non-material privacy breaches | 77 |
|---|----|

Section 12: Resources Related to the Privacy Act

12.1 Allocated Costs

| Expenditures | | Amount |
|-----------------------------------|----------|--------------------|
| Salaries | | \$1,862,800 |
| Overtime | | \$43,697 |
| Goods and Services | | \$22,380 |
| • Professional services contracts | \$0 | |
| • Other | \$22,380 | |
| Total | | \$1,928,877 |

12.2 Human Resources

| Resources | Person Years Dedicated to Privacy Activities |
|----------------------------------|--|
| Full-time employees | 22.458 |
| Part-time and casual employees | 0.611 |
| Regional staff | 0.000 |
| Consultants and agency personnel | 0.000 |
| Students | 0.971 |
| Total | 24.040 |

Note: Enter values to three decimal places.