

Ombudsman

National Defence and
Canadian Armed Forces



Défense nationale et
Forces armées canadiennes

Annual Report to Parliament on the Administration of the Privacy Act

2018-2019

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1 Introduction

The purpose of the *Privacy Act* is to extend to individuals the right of access to information about themselves held by the government, subject to specific and limited exemptions. It protects individuals' privacy by preventing others from having access to their personal information and by affording individuals substantial control over how their personal information is collected, used, and disclosed.

1.1 Background

Section 72 of the *Privacy Act* requires that the head of every government institution prepare and submit to Parliament an annual report on the administration of the Act within the institution. This is the seventeenth report to Parliament on performance with respect to administration of the act by the Office of the Ombudsman for the Department of National Defence and the Canadian Forces (the Office or the Office of the Ombudsman).

The Office of the Ombudsman is committed to openness and transparency about its administration and functioning. The Office endeavours to ensure that information about its work is widely disseminated and easily available. For example, the Ombudsman's annual reports, special reports and press releases are posted on the Office's website as soon as they are released. The website also contains case studies and statistics on the Office's caseload, and educational material on subjects of interest to our constituents.

Critical to the resolution of complaint files and investigations is the confidentiality of the information provided by the constituents who come forward. Therefore, before any case study or report is released, identifying information is removed to ensure the protection of personal information and confidentiality of our communications.

As the Ombudsman's Office is part of the Defence portfolio, disclosure of the Ombudsman's travel and hospitality expenses, contracts over \$10,000 and position reclassifications are reported on the National Defence website <http://www.admfincs.forces.gc.ca/pd-dp/index-eng.asp>.

The Office of the Ombudsman proactively posts to its website correspondence between the Ombudsman and senior officials on matters of interest to our constituency. This initiative is in keeping with the Ombudsman's goal of promoting transparency and with the Open Government initiative. In accordance with the Directive on Open Government, correspondence is reviewed prior to release to ensure it does not contain any information raising concerns about privacy, confidentiality or security. The Access to Information and Privacy Unit conducts the review of correspondence prior to release. Correspondence can be found on the Ombudsman website in the Letters and Statements section; at <http://www.ombudsman.forces.gc.ca/en/ombudsman-news-events-media-letters/index.page>

1.2 Mandate of the Office of the Ombudsman for the Department of National Defence and the Canadian Forces

The first Ombudsman for the Department of National Defence and the Canadian Forces was appointed in June 1998 by Governor in Council (Federal Cabinet). The creation of an Ombudsman institution was part of a wide range of initiatives brought forth by the Government of Canada to enhance the overall fairness and effectiveness of the military justice system, enhance the transparency of internal review mechanisms, streamline the Canadian Armed Forces grievance process, and promote greater openness, accountability and transparency within the Department of National Defence and the Canadian Forces.

The duties and functions of the Ombudsman are set out in the *Ministerial Directives Respecting the Ombudsman for the Department of National Defence and the Canadian Forces*:

<http://www.ombudsman.forces.gc.ca/en/ombudsman-about-us/ministerial-directives.page>.

The *Ministerial Directives* confirm that the Ombudsman and the Office operate outside the military chain of command as well as outside the civilian management of the Department of National Defence. The Ombudsman reports directly to, and is accountable only to, the Minister of National Defence, who is responsible for the management and direction of the Canadian Armed Forces and of all matters relating to national defence. However, the Ombudsman operates at arm's-length from the Minister, preserving the Ombudsman's independence from the executive function.

The *Ministerial Directives* governing the Office provide that the Ombudsman is to act, on the Minister's behalf, as a neutral and objective sounding board, mediator, investigator and reporter on matters related to the Department of National Defence and the Canadian Armed Forces. The Ombudsman also acts as a direct source of information, referral and education to assist individuals in accessing existing internal channels of assistance and redress. The overall goal of the Office of the Ombudsman is to contribute to substantial and long-lasting improvements to the welfare of the Defence community.

Under the *Ministerial Directives*, the Ombudsman is required to issue an annual report to the Minister of National Defence on the operations of the Office. The *Ministerial Directives* further provide that the Ombudsman may publish reports concerning any investigation if the Ombudsman considers that it is in the public interest to do so.

1.3 Structure of the Access to Information and Privacy Unit

The ATIP unit for the Office of the Ombudsman is part of the Legal Services Directorate and is managed by the institution's Access to Information and Privacy Coordinator. Pursuant to section 73 of the *Privacy Act*, the Minister of National Defence designated the Office's ATIP Coordinator to exercise all powers and perform the duties and functions of the Minister under the Act as it concerns the Office of the Ombudsman. This arrangement reflects the Office's independent, arm's length relationship with the Department of National Defence and Canadian Armed Forces. A copy of the delegation order appears in Appendix A to this report.

A major challenge to the application of the ATIP legislation lies in the *Ministerial Directives* that establish the Office of the Ombudsman. One of the main functions of the Office is to conduct confidential investigations, yet the records are not fully protected by having either the status of an investigative body under the regulation or having a specific provision protecting the Office's investigative records. A further challenge is caused by the fact that some of the information that is required by this Office to conduct its investigations is held by other parts of the Defence community that are designated as investigative bodies or who claim exemptions under the ATIP legislation.

Because of the interplay of the Office's mandate and the ATIP legislation, legal guidance is often called upon to find the balance between the application of the mandate and compliance with the ATIP legislation, whether it be protection of personal information or access to information.

The ATIP Unit is responsible for the following activities:

- Processing requests under the *Access to Information Act* and the *Privacy Act*;
- Responding to consultation requests from other government institutions;
- Monitoring institutional compliance with the aforementioned Acts, regulations and relevant procedures and policies;
- Acting on behalf of the Office of the Ombudsman in dealings with the Treasury Board of Canada Secretariat, the offices of the Information Commissioner and Privacy Commissioner of Canada and other government institutions regarding the administration and application of the above legislation as it relates to the Office of the Ombudsman;
- Preparing annual reports to Parliament and other statutory reports and material that may be required by central agencies;
- Developing and delivering awareness training to the managers and employees of the Office to ensure responsiveness to the legal obligations imposed by both Acts and regulations;
- Conducting and providing direction to program managers regarding the completion of Privacy Impact Assessments (PIAs);
- Reviewing potential privacy breaches, and taking steps to deal with breaches;

- Publishing updates to *Info Source* annually or as needed;
- Participating in ATIP networks such as the Treasury Board Secretariat's ATIP Community meetings;
- Developing and implementing internal policies and office standards.

The ATIP unit has one ATIP Officer who administers the processing of ATIP files, among other duties. The ATIP Unit also engages a consultant, on an as-needed basis, to assist with processing of requests.

2 Key Activities and Accomplishments

2.1 Education and Training Activities

Those responsible for the delivery of the Ombudsman's ATIP services regularly attend learning activities presented by the Treasury Board of Canada Secretariat, Information and Privacy Policy Division and other learning institutions.

- ATIP staff attended two (2) Treasury Board Secretariat coordinators and community meetings.
- A presentation was delivered to all staff (59 employees) on the proposed amendments to the *Access to Information Act* and new frontiers in privacy.
- The ATIP unit was also responsible for providing information to respond to four (4) Parliamentary inquiries (order paper questions) on the administration of the ATIP legislation.

2.2 Institutional Privacy Policies and Procedures

The Office of the Ombudsman has not implemented any new and/or revised institution-specific policy, guideline or procedure during this reporting period.

2.3 Summary of Material Privacy Breaches

The Office of the Ombudsman did not have any material privacy breaches over the reporting period.

2.4 Privacy Impact Assessments

During the reporting period, no Privacy Impact Assessments or Preliminary Privacy Impact Assessments were initiated, completed or forwarded to the Office of the Privacy Commissioner.

2.5 Data Matching

No data matching or sharing activities were undertaken by the Office during the reporting period.

2.6 Disclosures under 8(2)(m) of the *Privacy Act*

Paragraph 8(2)(m) allows for the disclosure of personal information when the public interest clearly outweighs any invasion of privacy or when the disclosure would benefit the individual. There were no disclosures under paragraph 8(2)(m) during this reporting period.

3 Statistical Report on the Administration of the *Privacy Act*

This section provides information about the processing of requests under the *Privacy Act*. Appendix B provides a statistical summary of the requests received and/or finalized during this reporting period 2018-2019.

3.1 Formal Requests under the *Privacy Act*

The Office of the Ombudsman received ten (10) new requests under the *Privacy Act* during the period from April 1, 2018 to March 31, 2019. In one (1) case, no records were found. For the nine (9) formal transactions, the total number of pages reviewed was 2,510.

In five (5) cases, full disclosure was provided. In four (4) cases, partial disclosure was made. Five (5) requestors were provided with paper copies of their records, and four (4) with electronic copies.

There was one (1) request for corrections to personal information in the reporting period. A notation was placed on the file.

3.2 Exemptions to the Release of Information

In the four (4) cases of partial disclosure, exemptions were invoked based on section 26 (personal information of another individual) of the *Privacy Act*.

The Office of the Ombudsman does not receive a high volume of requests for personal information; over the last five years, the number of requests has ranged from four (4) to twelve (12). Therefore, it is not possible to report on trends with any statistical significance. Having said that, over the same five year time period, information was only withheld on the basis of sections 26 and 27 of the *Privacy Act*.

3.3 Extension of the Time Limit

In all 10 (ten) cases, the requests were completed in less than 30 days; no extensions beyond the 30 day statutory limit were required.

While the low volume of requests to the Office requires a caution as to the statistical significance of any trend analysis, it is possible to say that the vast majority of requests over the past five years have been completed within the statutory timeline of 30 days. Of the 41 requests for personal information completed in the same five-year time frame, extensions were only necessary in four (4) instances; this represents approximately 10% of the files. Three (3) of the four (4) extensions were needed to conduct consultations; the fourth extension was required due to the volume of records reviewed.

3.4 Informal Privacy Requests

During the current reporting period the ATIP Unit processed one (1) informal request, with a total of 63 pages.

The Office's policy is to keep all parties informed of the progress of each case, and keep constituents informed of the status of their file.

3.5 Complaints and Audits

During this reporting period, no complaints were filed with the Privacy Commissioner regarding the handling of requests under the *Privacy Act*, and no audits or investigations were conducted.

One (1) complaint filed with the Privacy Commissioner in the previous fiscal year was closed by the Commissioner, as unfounded.

3.6 Fees and Costs

There are no costs associated with ATIP specific software as the volume of requests does not warrant the expenditure. A consultant was employed to assist with the processing of one (1) request, due to the volume of records.

- The total cost assigned to the administration of the *Privacy Act* totalled \$33,696
- Other administrative costs amounted to \$273
- The total costs were \$35,848

4 Monitoring – Privacy Requests

The ATIP Unit uses a tracking spreadsheet to monitor processing times for privacy requests. The ATIP Coordinator reports to the senior management committee as necessary for their situational awareness. The senior management committee includes the Ombudsman, Directors General and Directors.

Annex 1: Delegation Order

Copy of Delegation Order

Minister
of National Defence



Ministre
de la Défense nationale

Ottawa, Canada K1A 0K2

SEP: 0 5 2002

Mr. André Marin
Department of National Defence
and Canadian Forces Ombudsman
12th Floor, 100 Metcalfe Street
Ottawa ON K1P 5M1

Dear Mr. Marin:

I would like to acknowledge and thank you for your letter, received on August 1, 2002, concerning the Designation Order for the *Access to Information Act* and the *Privacy Act*.

I concur with your request and have signed the enclosed English and French copies of the Designation Order.

Once again, thank you for bringing this information to my attention.

Yours sincerely,


The Honourable John McCallum, P.C., M.P.

Enclosures: 2

Canada

(Traduction non officielle)

Le 5 septembre 2002

Monsieur André Marin
Ombudsman du ministère de la Défense nationale et
des Forces canadiennes
12^e étage, 100, rue Metcalfe
Ottawa (Ontario) K1P 5M1

Monsieur Marin,

J'accuse réception et je vous remercie de votre lettre, reçue le 1^{er} août 2002, concernant l'arrêté sur la délégation relative à la *Loi sur l'accès à l'information* et la *Loi sur la protection des renseignements personnels*.

Je suis d'accord avec votre demande et j'ai signé les versions anglaise et française de l'arrêté sur la délégation.

Encore une fois, je vous remercie d'avoir porté cette information à mon attention.

Je vous prie d'agréer, Monsieur Marin, l'expression de mes sentiments les meilleurs.

L'honorable John McCallum, C.P., député.

Pièces jointes : 2

Designation Order

Access to Information and Privacy Act

The Minister of National Defence, pursuant to section 73 of the *Access to Information Act* and the *Privacy Act*, hereby designates the person holding the position of Access to Information and Privacy Coordinator, Office of the Ombudsman, National Defence and Canadian Forces, to exercise all powers and perform the duties and functions of the Minister as the head of the Department of National Defence and the Canadian Forces under the Acts, concerning the Office of the Ombudsman, National Defence and Canadian Forces.

In the absence of the Access to Information and Privacy Coordinator, Office of the Ombudsman, National Defence and Canadian Forces, the Minister, pursuant to section 73 of the Acts, hereby designates the person acting as Access to Information and Privacy Coordinator for the Office of the Ombudsman, National Defence and Canadian Forces, to exercise the powers and perform the duties and functions of the Minister under the Acts, concerning the Office of the Ombudsman, National Defence and Canadian Forces.

Date: _____



The Honourable John McCallum, P.C., M.P.
Minister of National Defence

Writers/ MCU2002-05726(French)

Arrêté sur la délégation

Loi sur l'accès l'information et Loi sur la protection des renseignements personnels

En vertu de l'article 73 de la *Loi sur l'accès l'information* et de *Loi sur la protection des renseignements personnels*, le ministre de la Défense nationale désigne le titulaire du poste de coordonnateur de l'accès à l'information et de la protection des renseignements personnel du Bureau de l'ombudsman du ministère de la Défense nationale et des Forces canadiennes, pour exercer tous les pouvoirs et remplir toutes les fonctions dont il est, en qualité de responsable du ministère de la Défense nationale et des Forces canadiennes, investi aux termes des ces *lois*, au sujet du Bureau de l'ombudsman du ministère de la Défense nationale et des Forces canadiennes.

En l'absence du coordonnateur de l'accès à l'information et de la protection des renseignements personnel du Bureau de l'ombudsman du ministère de la Défense nationale et des Forces canadiennes, le Ministre, en vertu de l'article 73 de ces *lois*, désigne la personne agissant pour le titulaire du poste de coordonnateur de l'accès à l'information et de la protection des renseignements personnel du Bureau de l'ombudsman du ministère de la Défense nationale et des Forces canadiennes pour exercer les pouvoirs et remplir toutes les fonctions qui sont attribuées au Ministre aux termes de ces *lois*, au sujet du Bureau de l'ombudsman du ministère de la Défense nationale et des Forces canadiennes.

Date : _____



L'honorable John McCallum, C.P., député
Ministre de la Défense nationale

Annex 2: Statistical Report on the *Privacy Act*

Statistical Report on the *Privacy Act*

Name of institution: Ombudsman for National Defence and Canadian Forces

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

Part 1: Requests Under the *Privacy Act*

	Number of Requests
Received during reporting period	10
Outstanding from previous reporting period	0
Total	10
Closed during reporting period	10
Carried over to next reporting period	0

Part 2: Requests Closed During the Reporting Period

2.1 Disposition and completion time

Disposition of Requests	Completion Time							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
All disclosed	3	2	0	0	0	0	0	5
Disclosed in part	2	2	0	0	0	0	0	4
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	1	0	0	0	0	0	0	1
Request abandoned	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	6	4	0	0	0	0	0	10

2.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(a)(i)	0	22.4	0
19(1)(a)	0	22(1)(a)(ii)	0	23(a)	0
19(1)(b)	0	22(1)(a)(iii)	0	23(b)	0
19(1)(c)	0	22(1)(b)	0	24(a)	0
19(1)(d)	0	22(1)(c)	0	24(b)	0
19(1)(e)	0	22(2)	0	25	0
19(1)(f)	0	22.1	0	26	4
20	0	22.2	0	27	0
21	0	22.3	0	27.1	0
				28	0

2.3 Exclusions

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

2.4 Format of information released

Disposition	Paper	Electronic	Other formats
All disclosed	2	3	0
Disclosed in part	3	1	0
Total	5	4	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Disposition of Requests	Number of Pages Processed	Number of Pages Disclosed	Number of Requests
All disclosed	154	154	5
Disclosed in part	2356	2356	4
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	0	0	0
Neither confirmed nor denied	0	0	0
Total	2510	2510	9

2.5.2 Relevant pages processed and disclosed by size of requests

Disposition	Less Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
All disclosed	5	154	0	0	0	0	0	0	0	0
Disclosed in part	2	49	0	0	0	0	2	2307	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	7	203	0	0	0	0	2	2307	0	0

2.5.3 Other complexities

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

2.6 Deemed refusals

2.6.1 Reasons for not meeting statutory deadline

Number of Requests Closed Past the Statutory Deadline	Principal Reason			
	Workload	External Consultation	Internal Consultation	Other
0	0	0	0	0

2.6.2 Number of days past deadline

Number of Days Past Deadline	Number of Requests Past Deadline Where No Extension Was Taken	Number of Requests Past Deadline Where An Extension Was Taken	Total
1 to 15 days	0	0	0
16 to 30 days	0	0	0
31 to 60 days	0	0	0
61 to 120 days	0	0	0
121 to 180 days	0	0	0
181 to 365 days	0	0	0
More than 365 days	0	0	0
Total	0	0	0

2.7 Requests for translation

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

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

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

Part 4: Requests for Correction of Personal Information and Notations

Disposition for Correction Requests Received	Number
Notations attached	1
Requests for correction accepted	0
Total	1

Part 5: Extensions

5.1 Reasons for extensions and disposition of requests

Disposition of Requests Where an Extension Was Taken	15(a)(i) Interference With Operations	15(a)(ii) Consultation		15(b) Translation or Conversion
		Section 70	Other	
All disclosed	0	0	0	0
Disclosed in part	0	0	0	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	0	0	0	0
Request abandoned	0	0	0	0
Total	0	0	0	0

5.2 Length of extensions

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

Part 6: Consultations Received From Other Institutions and Organizations

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

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during the reporting period	0	0	0	0
Outstanding from the previous reporting period	0	0	0	0
Total	0	0	0	0
Closed during the reporting period	0	0	0	0
Pending at the end of the reporting period	0	0	0	0

6.2 Recommendations and completion time for consultations received from other Government of Canada institutions

Recommendation	Number of Days Required to Complete Consultation Requests							
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

6.3 Recommendations and completion time for consultations received from other organizations

Recommendation	Number of days required to complete consultation requests							
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

Part 7: Completion Time of Consultations on Cabinet Confidences

7.1 Requests with Legal Services

Number of Days	Fewer Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

7.2 Requests with Privy Council Office

Number of Days	Fewer Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

Part 8: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
1	0	0	0	1

Part 9: Privacy Impact Assessments (PIAs)

Number of PIA(s) completed	0
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Part 10: Resources Related to the Privacy Act

10.1 Costs

Expenditures		Amount
Salaries		\$33,696
Overtime		\$0
Goods and Services		\$2,152
• Professional services contracts	\$1,879	
• Other	\$273	
Total		\$35,848

10.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.32
Part-time and casual employees	0.00
Regional staff	0.00
Consultants and agency personnel	0.00
Students	0.00
Total	0.32